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ENVIRONMENTAL
PROTECTION AGENCY
REGION II

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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

HAZARDOUS WASTE
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JUN 7 1988

William Melofchik
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de listment
✓ C119=3
✓ C305=4 done 7/20/88
✓ CMT-OK

Dear Mr. Melofchik:

RE: Ganes Chemicals Inc., Carlstadt, Bergen County, EPA ID NO. NJD 001
213 727, TS-88-5

The Bureau of Hazardous Waste Engineering is in receipt of your letter dated March 28, 1988 requesting an approval to accumulate hazardous wastes in the P-6 tank at the above referenced facility for ninety days or less in accordance with N.J.A.C. 7:26-9.3(b).

A review of the information provided in the March 28 letter has been completed. Based on this review and the site visit to the facility made by Jean Adragna of my staff on May 19, 1988, the Bureau hereby grants approval to the above facility to accumulate hazardous waste in the P-6 tank for 90 days or less providing the following requirements of N.J.A.C. 7:26-9.3(b) are met:

1. Tank Shell Thickness
 - i. The tank shall be tested annually. A minimum shell thickness of 0.1875 inches shall be maintained to ensure the P-6 tanks will not collapse or rupture.
 - ii. The facility shall visually inspect and perform acoustical emission tests annually to determine if any significant deterioration evidenced by obvious wall thinning, discoloration, disintegration, crazing, softening, swelling, indentations or delamination has occurred.
2. The tank shall be rendered empty, as defined in 7:26-1.4, every 90 days or less.
3. All waste removed from the tank shall be shipped off site to an authorized facility or placed in an on site, authorized facility, as defined in 7:26-1.4, every 90 days or less.

JUN 7 1988

4. The secondary containment area shall be designed and constructed in accordance with the information provided during the site visit and in accordance with N.J.A.C. 7:26-10.5(c). Accumulation in the tank shall not take place until after the containment area is completed. The Bureau shall be notified upon the date of completion.
5. Ganes Chemicals, Inc. shall comply with the requirements for owners or operator of hazardous waste facilities under N.J.A.C. 7:26-9.4(g), 9.6 and 9.7 for personnel training, preparedness and prevention, and the contingency plan respectively.
6. While being accumulated on-site, tank P-6 shall be clearly labeled or marked with the words "Hazardous Waste".

The above referenced facility was removed from the Department's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) on March 3, 1983 and this letter constitutes approval of use of tank P-6 for the accumulation of hazardous waste for 90 days or less. Therefore, Ganes Chemicals does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1.1 et seq. for existing facilities. It is the facility's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the Department is a violation of the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq.

The issuance of this permit exemption letter by the Department does not indicate or imply, and should not be construed as a waiver of any requirements concerning the New Jersey Pollutant Discharge Elimination System, N.J.A.C. 7:14A-1 et seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (90) days (or 180 days at the option of the Division of Water Resources) to the Bureau of Ground Water Discharge Permits, CN-019, Trenton, New Jersey, 08625. Applications may be obtained by calling (609) 292-0424.

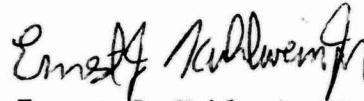
In addition, please be advised that before accumulating a material, that is either non-hazardous or non-compatible, in an approved tank, Ganes Chemicals shall decontaminate the tank by triple rinsing the interior surface of the tank with a suitable solvent. The rinses generated during the decontamination shall be handled and disposed of as hazardous waste to an off-site authorized disposal facility.

Lastly, should Ganes Chemicals add a compatible non-hazardous waste to an approved tank which previously held a listed hazardous waste and the tank was not decontaminated prior to the addition of the non-hazardous waste, then in accordance with N.J.A.C. 7:26-8.1(a)2iii, "the Mixture Rule", the resulting material shall be handled and disposed of as a hazardous waste.

JUN 7 1988

If you have any questions, please contact Jean Adragna of my staff at (609) 292-9880.

Very truly yours,



Ernest J. Kuhlwein, Jr., Chief
Bureau of Hazardous Waste Engineering

EP12/slw

cc: Barry Tornick
Yacoub Yacoub, MFO

DOCUMENT: GANES2
FOLDER: SLWMCB

*Not on CA Universe
list*

DRAFT
ENVIRONMENTAL PRIORITIES INITIATIVE
VISUAL SITE INSPECTION REPORT
FOR
GANES CHEMICALS, INCORPORATED
CARLSTADT, BERGEN COUNTY, NEW JERSEY
EPA I.D. NO. NJD001213727

Prepared by:

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Prepared for:

U.S. Environmental Protection Agency
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In response to:

EPA Contract No. 68-W9-0040
Work Assignment No. R02-32-01

June 1992

VISUAL SITE INSPECTION REPORT

GANES CHEMICALS, INCORPORATED
CARLSTADT, BERGEN COUNTY, NEW JERSEY
EPA I.D. NO. NJD001213727

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I. EXECUTIVE SUMMARY

EPA's Environmental Priorities Initiative (EPI) uses an integrated approach between CERCLA and RCRA to ensure that the most environmentally significant facilities and sites are given a priority for clean-up. As part of this Initiative, a Preliminary Assessment (PA) report was prepared by NUS Corporation for the U.S. EPA Region II on the Ganes Chemicals, Inc. facility in April 1990. The PA report encompassed a file material review and a drive-by inspection. The PA report classified the Ganes Chemicals facility as No Further Remedial Action Planned (NFRAP) due to the minimal environmental impact associated with the operation of the facility. A Visual Site Inspection (VSI) was performed on March 13, 1992 by A.T. Kearney to confirm the findings of the PA report, to identify additional solid waste management units (SWMUs) or areas of concern (AOCs), and to evaluate the appropriateness of the NFRAP designation.

The VSI determined that several of the raw material drum storage areas at the facility were incorrectly identified as SWMUs in the PA report. Other SWMUs, including those identified in the PA report and those identified during the VSI, were inspected and found to have minimal potential for releases to the environment, due to appropriate engineering controls and waste management practices. All AOCs identified in the PA report and during the VSI were reported by the facility representative to have been remediated. In summary, the Ganes Chemicals facility was observed to be clean and well organized, and appeared to have clear and consistent methods to manage hazardous materials. Therefore, based on the findings of the VSI, the PA report NFRAP designation is confirmed.

II. FACILITY DESCRIPTION

Ganes Chemicals, Inc. is located in a mixed use residential/commercial/industrial area of Bergen County in Carlstadt, New Jersey. The facility consists of four contiguous properties separated by public roadways. The Passaic River is located approximately one mile to the west, and the edge of the Hackensack Meadowlands, a coastal wetlands, is located approximately two miles to the east. The company occupies several buildings and sheds used for warehouse storage, administrative offices, and operational and maintenance equipment. Also located at the site are four small quality control laboratories and twelve manufacturing process areas.

Ganes Chemicals manufactures bulk pharmaceutical products and has occupied the manufacturing and laboratory portions of the facility property since 1929. Ganes Chemicals acquired an office building on an adjacent property to the east in the 1930s, a raw materials and product storage warehouse on an adjacent property to the southwest in the 1940s, and an equipment and file storage warehouse and vacant property lot to the south in the 1980s. A new office building was constructed on the vacant lot to the south within the last two years. Uses of the property prior to 1929 are unknown.

Hazardous wastes are generated at the facility as by-products of the pharmaceutical manufacturing processes and primarily include spent solvents. Hazardous wastes are currently stored in containers located in concrete paved outdoor storage areas. The facility also may store hazardous wastes in an aboveground storage tank with secondary containment, although the tank has only been intermittently used from 1988 to 1990.

Ganes Chemicals is a privately owned company that submitted a Part A Treatment, Storage, Disposal Facility (TSDF) permit application in November 1980. A permit was needed at that time because of the difficulty in arranging for off-site shipments of hazardous wastes within the 90 day regulatory limit. In 1983 the U.S. EPA modified the facility's status from TSDF to generator only, since off-site waste disposal could be accomplished within 90 days. According to the facility representative, it has always been the company's practice to ship its hazardous wastes off-site for disposal, even prior to their being regulated. The facility currently maintains several NJDEPE air permits covering emissions from manufacturing process equipment and an industrial wastewater discharge permit covering discharge to the local sanitary sewer system.

III. SOLID WASTE MANAGEMENT UNITS IDENTIFIED IN THE PRELIMINARY ASSESSMENT

A PA report on Ganes Chemicals, Inc. was prepared in April 1990 by NUS Corporation. The PA report was based on information gathered from the files of the EPA and the NJDEPE and on observations noted during a drive-by investigation performed on March 22, 1990. The report identified three drum storage areas and one above ground waste storage tank as SWMUs. A VSI was performed on March 13, 1992 by A.T. Kearney to confirm the findings of the PA report. Information on Ganes Chemicals operations was provided by Mr. William Melofchik, Manager of Environmental Affairs.

SWMU 1(a) - Container Storage Area

No Photograph

One drum storage area identified in the PA report was located to the south of the manufacturing building located between Lincoln Street and Orchard Street. The VSI established that this area is not currently a SWMU but a recovered solvent storage area. Recovered solvents are reused as raw materials in the pharmaceutical manufacturing processes. According to the facility representative, it has been a long-standing practice to store raw material containers in this area. Solvents are recovered in the facility's numerous solvent distillation units (SWMU 6).

The recovered solvents are stored in polyethylene or steel 55-gallon drums in an outdoor concrete-paved storage area that is sloped toward one of the facility's wastewater treatment system collection trenches (SWMU 5). The concrete pavement was observed to be in good condition with no evidence of staining. Adjacent areas to the south and east of the concrete pad are unpaved. The drums in this area all appeared to be in good condition, and were closed and labelled. According to the facility representative, no spills or releases have occurred in this storage area.

SWMU 1(b) - Container Storage Area

Photographs 1-1 and 1-2

The second drum storage area noted in the PA report is located directly to the north of the Ganes Chemicals warehouse along Garden Street (Photos 1-1 and 1-2). The VSI established that this area is not currently a SWMU but a raw material storage area. Chemicals used in the manufacturing processes are stored in 55-gallon polyethylene or steel drums on wooden pallets in an outdoor concrete-paved storage area. The concrete pavement, observed to be clean and in good condition, was equipped with containment curbing on three sides and sloped to a self-contained concrete sump in the northwest corner. The areas adjacent to this containment were concrete-paved to the south and unpaved to the east, north and west. Empty, cleaned polyethylene drums are

also stored to the west of the containment area. During the VSI, approximately 300 drums were observed, all of which appeared to be in good condition and were closed and labelled.

The facility representative indicated that this area has been used for raw materials storage since the property was purchased in the 1940s. Originally, the storage area consisted merely of concrete pavement; the current containment system was installed in the mid-1980s. According to the facility representative, no spills or releases have occurred in this storage area.

SWMU 1(c) - Container Storage Area

No Photograph

The third drum storage area noted in the PA report is located directly to the north of the raw materials storage area (described above) along Garden Street. The VSI confirmed this area to be a SWMU, but one that is not used for the management of hazardous wastes. This outdoor concrete- and gravel-paved area is used to store empty drums awaiting pickup by a drum disposal company for off-site shredding. The facility representative indicated that it has been a long-standing practice to store empty drums in this area. All drums are steam-cleaned in the drum cleaning area (SWMU 4) to remove any residual chemicals before they are moved to this storage area. The concrete pavement, installed approximately 2 years ago, was observed to be in good condition at the time of the VSI, and no staining of the concrete pad or gravel was observed.

SWMU 2 - Aboveground Waste Storage Tank

Photograph 1-4

Another SWMU identified in the PA report was an above ground hazardous waste storage tank with a capacity of 6,394 gallons. The VSI confirmed the tank to be a SWMU, although not in active use. The tank and secondary containment berm were installed shortly after March 1988, when Ganes Chemicals applied to the NJDEP for permission store corrosive or spent solvent wastes in the tank for less than 90 days. Wastes were pumped out of the tank into a tanker truck for off-site disposal. According to the facility representative, the tank has been used intermittently since 1988 to store waste solvents but has been empty for approximately two years. The tank is constructed of fiberglass and sits on metal footings over a concrete pad contained within an approximately 3-foot high concrete berm. According to the facility representative, the berm is sufficient to contain the volume of the tank plus ten percent. At the time of the VSI, the tank was noted to be empty and the concrete pad and berm were observed to be in good condition. The facility representative reported that no spills or releases from this tank have occurred.

IV. AREAS OF CONCERN IDENTIFIED IN THE PRELIMINARY ASSESSMENT

The PA report prepared in April 1990 by NUS Corporation identified a soil pile, an underground oil storage tank removal site, and two air release sites as AOCs at the Ganes Chemicals, Inc. facility.

AOC A - Soil Pile

No Photograph

One AOC noted during the PA report drive-by investigation on March 22, 1990 was a pile of soil just to the north of the empty drum storage area along Garden Street. During the VSI, the facility representative explained that the soil pile, which was covered and placed on plastic sheeting, was generated from the removal and replacement of an underground toluene product storage tank (AOC D) at the facility. The soil from the tank pit was temporarily stored at the facility pending the results of sampling for toluene contamination. The facility representative reported that the soil was found to be free of contamination and was disposed off-site.

AOC B - Fuel Oil Leak

Photograph 1-6

Another AOC identified in the PA report was an oil leak discovered during the replacement of a 15,000-gallon underground fuel oil storage tank in 1987. The fuel oil tank is located in the outdoor yard behind the manufacturing buildings occupying the southern portion of the block between Orchard Street and Garden Street. The concrete pavement at the base of the Hazardous Waste Container Storage Area (SWMU 3) overlies the unit. Oil contaminated soil and water were reported to NJDEP by a Bergen County Health Department official, who was on-site to observe the tank removal in 1987. According to the facility representative, all oil contaminated material was removed from the excavation to non-detectable levels within three weeks of tank removal, and a new 15,000 gallon stainless-steel, double-walled tank was installed in the same location. No groundwater monitoring wells were installed in conjunction with the fuel oil clean-up. The fill and vent pipes and the concrete paving overlying the new tank were all observed to be in good condition at the time of the VSI.

AOC C - Air Releases

No Photograph

A third AOC identified in the PA report involved releases of organic constituents to the atmosphere. One incident involved an atmospheric release of methyl isobutyl ketone in February 1988 as a result of a mechanical error. The other incident was an atmospheric release of bromobenzene in April 1988 due to the inexperience of a new employee. Although, the releases were

confirmed by the facility representative, the exact process units involved in the releases could not be identified during the VSI.

Information contained in the PA report indicated that scrubbers were installed to eliminate further atmospheric releases due to mechanical error. Several corrosive and organic vapor air scrubbers, all located inside process buildings, were identified during the VSI. Wastewater collection trenches are constructed in the buildings to intercept and collect discharges. It was reported that the corrosive vapor scrubbers generate sodium chloride salt as a by-product of the scrubbing process, and these wastes are discharged directly into the facility's wastewater treatment system (SWMU 5). Organic vapor scrubbers collect organic material that is fractionally distilled and reused in the manufacturing process; no wastes are reportedly generated from the organic vapor scrubbers at the facility.

Although the facility representative stated that older equipment at the facility does not require air permits (due to grandfather clauses in the air regulations), releases to the atmosphere from each piece of new or upgraded equipment are currently permitted. Ganes Chemicals is currently seeking to obtain one facility-wide air permit to eliminate the need to maintain several unit-specific air permits.

V. ADDITIONAL SOLID WASTE MANAGEMENT UNITS IDENTIFIED DURING THE VISUAL SITE INSPECTION

Additional SWMUs identified during the VSI on March 13, 1992 included a hazardous waste container storage area, a drum cleaning area, a wastewater treatment system, distillation units for recovering spent solvents, and hazardous waste satellite accumulation areas.

SWMU 3 - Hazardous Waste Container Storage Area Photograph 1-5

The hazardous waste container storage area is a concrete paved area located in the outdoor yard behind the manufacturing buildings occupying the southern portion of the block between Orchard Street and Garden Street. According to the facility representative, it is believed that the area has always been used as the facility's hazardous waste storage area. Hazardous wastes stored in this unit include spent solvents and pharmaceutical by-products that are managed in 55-gallon polyethylene or steel drums.

The unit has an overall storage capacity of approximately 100 drums, and wastes are reportedly shipped for off-site disposal when approximately 90 to 100 drums have accumulated, which currently occurs approximately once per month. For off-site shipment, a licensed waste disposal company pumps wastes directly out of drums and into a tank truck. All waste transfers occur over concrete pavement.

Emptied drums are stored in a concrete paved alleyway directly adjacent to the west side of the hazardous waste container storage area until they can be cleaned in the Drum Cleaning Area (SWMU 4). After cleaning, the drums are reused for waste storage. According to the facility representative, waste containers are not replaced at any specified frequency but are disposed of when rust, corrosion, or other damage is evident.

Although the concrete-paved container storage area is not equipped with curbing or other secondary containment, the entire outdoor storage and work yard is concrete paved and sloped to a wastewater treatment system collection trench (SWMU 5). The adjacent alleyway used for storage of empty drums is also sloped toward the wastewater collection trench. The concrete pavement was replaced in 1987, when the underlying fuel oil underground storage tank (AOC B) was replaced. During the VSI, containers, some of which had surface rust, were all observed to be closed and labelled, and the concrete pavement underneath the containers was noted to be in good condition. The facility representative indicated that no major spills or releases of hazardous wastes have occurred in the area.

SWMU 4 - Drum Cleaning Area

Photograph 1-16

A hazardous waste drum cleaning area inside one of the process buildings facing Broad Street was also identified during the VSI. Drums cleaned in this area include both empty hazardous waste and raw materials storage containers. Drum cleaning is performed on a concrete-paved area near a wastewater collection trench. Solvents are poured into the drum to loosen any sludge remaining at the bottom of hazardous waste storage containers. The waste/solvent mixture is then pumped into a hazardous waste drum for storage and eventual off-site disposal. The cleaned drums, which contain less than 1-inch of waste, are classified by the facility as RCRA-empty. The RCRA-empty drums are then steam cleaned and rinsed in the concrete-paved outdoor area of the facility over a drain leading to the facility's wastewater treatment system. The facility representative did not know how long drum cleaning has been performed in this area but stated that cleaning of drums at the facility has been a long standing practice.

SWMU 5 - Wastewater Treatment System

Photographs 1-10, 1-13,
1-14, 1-15, 1-16, 1-17

A Wastewater Treatment System was identified during the VSI. The system is located in the manufacturing areas of the facility that occupy the southern portions of the blocks bordered by Lincoln Street, Orchard Street, Garden Street, and Broad Street. The location of the Wastewater Treatment System is presented in Figure 1. The treatment system manages primarily non-contact cooling water and small amount of process rinse waters containing salts and trace amounts of solvents. The trenches are also used to manage small spills of hazardous materials and precipitation run-off from the outdoor work and storage areas.

The Wastewater Treatment System was installed when the facility began its operations in 1929. Portions of the system have been periodically repaired and reconstructed over the years. All repair work takes place during the facility's annual three week shut-down in the summer. The system consists of several collection trenches, three collection sumps, a central collection tank, and neutralization tank, and a settling tank. The collection trenches run throughout every process room and outdoor concrete paved work area. The trenches, which are approximately 1-foot wide by 1-foot deep and covered with steel gratings or steel plates, are currently constructed of concrete in which terra cotta tiles have been placed. According to the facility representative, a chemical sealant has been applied over the length of the trenches.

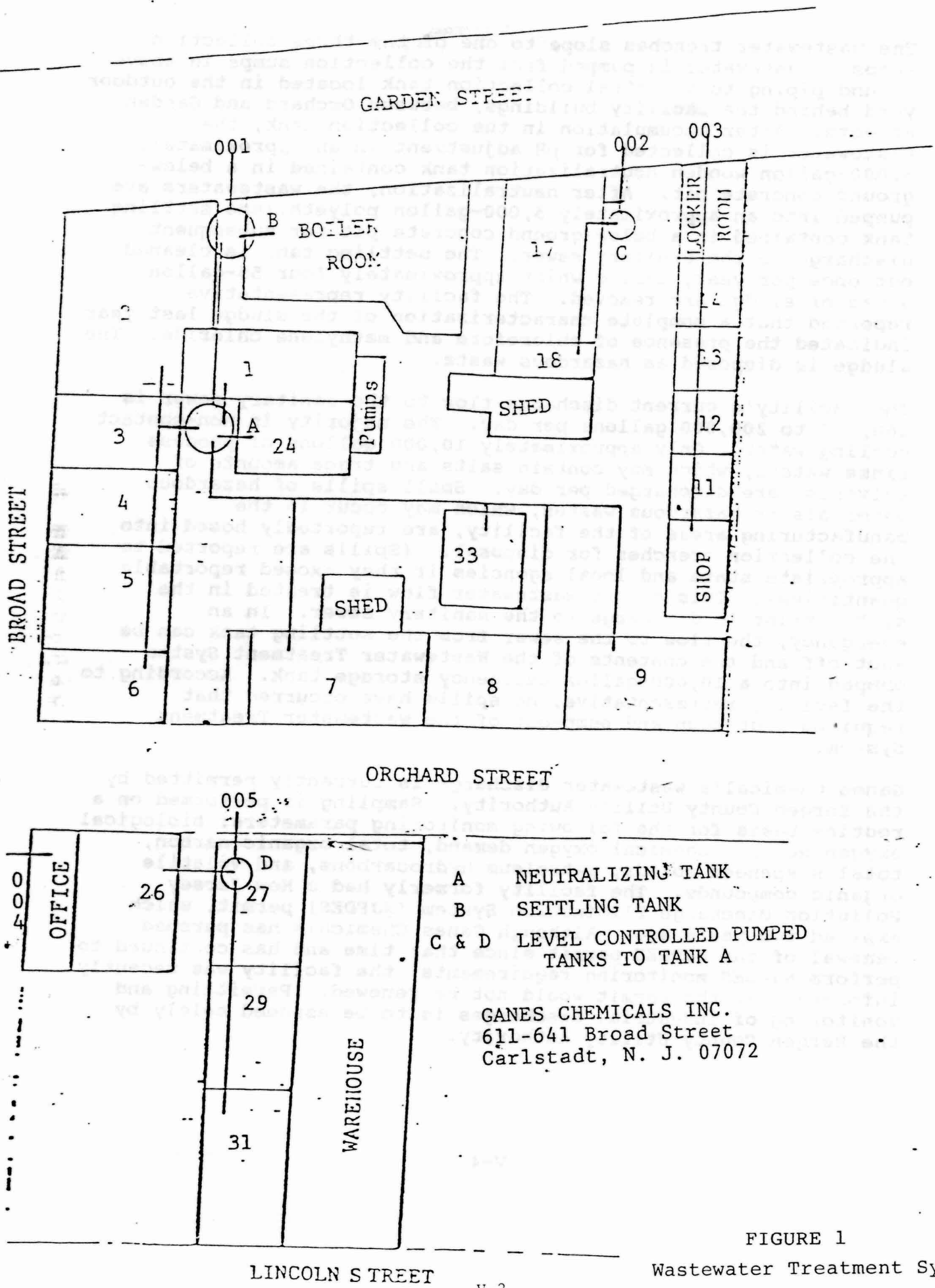


FIGURE 1

Wastewater Treatment System

The wastewater trenches slope to one of the three collection sumps. Wastewater is pumped from the collection sumps in above-ground piping to a central collection tank located in the outdoor yard behind the facility buildings, between Orchard and Garden Streets. After accumulation in the collection tank, the wastewater is collected for pH adjustment in an approximately 5,000-gallon wooden neutralization tank contained in a below-ground concrete pit. After neutralization, the wastewaters are pumped into an approximately 5,000-gallon polyethylene settling tank contained in a below-ground concrete pit for subsequent discharge to the sanitary sewer. The settling tank is cleaned out once per year, during which approximately four 55-gallon drums of sludge are removed. The facility representative reported that a complete characterization of the sludge last year indicated the presence of chloroform and methylene chloride. The sludge is disposed as hazardous waste.

The facility's current discharge flow to the sanitary sewer is 160,000 to 200,000 gallons per day. The majority is non-contact cooling water. Only approximately 10,000 gallons of process rinse waters, which may contain salts and trace amounts of solvents, are discharged per day. Small spills of hazardous materials or hazardous wastes, which may occur in the manufacturing areas of the facility, are reportedly hosed into the collection trenches for disposal. (Spills are reported to appropriate state and local agencies if they exceed reportable quantities). This entire wastewater flow is treated in the system prior to discharge to the sanitary sewer. In an emergency, the flow to the sewer from the settling tank can be shut off and the contents of the Wastewater Treatment System pumped into a 10,000-gallon emergency storage tank. According to the facility representative, no spills have occurred that required shut-down and pump-out of the Wastewater Treatment System.

Ganes Chemical's wastewater discharge is currently permitted by the Bergen County Utility Authority. Sampling is performed on a routine basis for the following monitoring parameters: biological oxygen demand, chemical oxygen demand, total organic carbon, total suspended solids, petroleum hydrocarbons, and volatile organic compounds. The facility formerly had a New Jersey Pollution Discharge Elimination System (NJPDDES) permit, which expired two years ago. Although Ganes Chemicals has pursued renewal of the NJPDDES permit since that time and has continued to perform NJPDDES monitoring requirements, the facility was recently informed that the permit would not be renewed. Permitting and monitoring of industrial discharges is to be assumed solely by the Bergen County Utility Authority.

SWMU 6 - Solvent Distillation Units

Photograph 1-12

Another SWMU identified during the VSI was the facility's solvent distillation units. According to the Ganes facility representative, all of the distillation units at the facility may be used either as components of the manufacturing processes or as stills to recover spent solvents, depending on the need. The facility representative indicated that there are no units that are specifically dedicated to solvent recovery. Spent solvents are accumulated in stills during the manufacturing of pharmaceutical products. The solvent mixtures are fractionally distilled and recovered solvents are reused in the manufacturing processes. Still bottoms are removed and placed in 55-gallon drums for disposal as hazardous waste.

All distillation units are located inside facility buildings over concrete flooring, and all process rooms have wastewater collection trenches. The age of the distillation units vary considerably from those that were installed in 1929 when the company began operations, to more recently installed units. According to the facility representative, there have been no major spills or releases associated with the distillation units. As previously discussed, all minor spills in the process areas of the facility are washed into the wastewater collection trenches for subsequent treatment at the wastewater treatment system (SWMU 5) and discharge to the sanitary sewer system.

SWMU 7 - Satellite Accumulation Areas

Photographs 1-9, 1-11

Ganes Chemicals also has approximately fourteen hazardous waste satellite accumulation areas. Satellite waste accumulation occurs in 55-gallon polyethylene or steel drums. Each of the twelve manufacturing process rooms has at least one waste accumulation drum for spent solvents, still bottoms, and pharmaceutical by-products. All process room accumulation drums are on concrete floors and inside buildings that have wastewater collection trenches.

Two of the fourteen areas are laboratory waste satellite accumulation drums stored on concrete in the outdoor work yard of the facility, which is concrete paved and sloped towards various wastewater collection trenches. Laboratory wastes, which include spent solvents, reagents, and waste pharmaceutical products from quality control testing are accumulated in small bottles inside each of the four laboratories. The bottles, when full, are emptied into the satellite accumulation drums in the outdoor work yard. When full, all waste accumulation drums are transferred to the hazardous waste container storage area for off-site disposal. Satellite accumulation drums observed during the VSI were noted to be in good condition, labelled, and closed when not in use. There are no reported spills or releases associated with the satellite accumulation areas.

VI. ADDITIONAL AREAS OF CONCERN IDENTIFIED DURING THE VISUAL SITE INSPECTION

An additional AOC identified during the VSI performed on March 13, 1992 included soil contamination discovered during the removal of an underground toluene raw materials storage tank in 1990. Although the soil pile from the toluene tank removal was identified in the PA report as an AOC, the tank excavation site itself was not.

AOC D - Toluene Tank Removal/Replacement Site

Photographs 1-3
1-5, 1-7, 1-8

There are six registered underground raw materials storage tanks at Ganes Chemicals. Chemicals stored in the tanks include: fuel oil, alcohol, caustics, toluene, and acetic anhydride. Although it is not known when underground tanks were originally installed at the facility (some are believed to have dated back to the original facility start-up in 1929), all underground tanks have reportedly been replaced within the last six years. The facility representative reported that soil samples were collected from excavations during tank removals/replacements to determine if leaks had occurred. (The leaks from the 15,000-gallon fuel oil storage tank have been previously described in this report.) Sampling performed during the removal/replacement of the remaining underground tanks indicated that some leakage had occurred from the 2,000-gallon toluene storage tank. The facility representative indicated that all soil possibly contaminated with toluene was excavated to a level of 0.2 parts per million. The soil was temporarily stockpiled to the north of the empty drum storage area along Garden Street (AOC A). Subsequent testing indicated that the soil was not contaminated, and it was disposed off-site.

Currently, all of Ganes Chemicals' underground storage tanks are double-walled and constructed of stainless steel. According to the facility representative, there has been no evidence of leakage from these new tanks. However, leak detection systems will be installed on all tanks by 1993, in accordance with new New Jersey underground storage tank regulations.

VII. CONCLUSIONS

The VSI determined that two raw material Container Storage Areas noted in the PA report (SWMUs 1(a) and 1(b)) were incorrectly identified as SWMUs. Other Container Storage Areas (SWMUs 1(c) and 2) identified in the PA report, were noted to have minimal potential for releases to the environment, due to appropriate engineering controls and waste management practices. SWMUs identified during the VSI, including a Hazardous Waste Container Storage Area, Drum Cleaning Area, Wastewater Treatment System, Solvent Distillation Units, and Satellite Accumulation Areas (SWMUs 3, 4, 5, 6, and 7), were noted to have minimal potential for releases to the environment, due to appropriate engineering controls and waste management practices. All AOCs identified in the PA report and identified during the VSI (AOCs A, B, C, and D) were reported by the facility representative to have been adequately remediated. The integrity of several components of the Wastewater Treatment System (SWMU 5), however, including the collection trenches, piping, neutralization tank, and settling tanks, could not be assessed during the VSI, due to the below-grade locations of the components. However, the neutralization tank and settling tank are contained with secondary containment pits. In addition, the collection trenches are lined with terra cotta tiles covered with a chemical sealant. For these reasons, the likelihood of a release from the Wastewater Treatment System was judged to be low.

The Ganes Chemicals facility was found at the time of the VSI to be clean and well organized and appeared to have clear, consistent, and appropriate methods to manage hazardous materials. Chemicals and chemical wastes are handled inside and outside the facility buildings over concrete paved surfaces with wastewater collection trenches and collection sumps constructed to intercept any spills in the manufacturing and chemical storage areas of the facility. Wastewater discharges from the facility are monitored under the provisions of an industrial discharge permit administered by the Bergen County Utility Authority. Releases to the air at the facility are regulated under the provisions of several unit-specific NJDEP air permits. Raw material and hazardous waste storage containers observed during the VSI were noted to be in good condition, labelled, and closed when not in use. Based on the findings of the VSI and the PA report, therefore, it appears that there is minimal potential for release of hazardous constituents to the environment from identified SWMUs and AOCs at the facility. As a result, the designation of NFRAP for Ganes Chemicals, Inc. is confirmed.

TABLE 1

Ganes Chemicals, Inc.
Summary of Solid Waste Management Units
and Areas of Concern

UNIT NUMBER AND NAME	STATUS*	SUMMARY/COMMENTS
SWMU 1(a): Container Storage Area	A	Recovered solvent raw material storage area. Containers stored on concrete pavement sloped to wastewater treatment system collection trenches.
SWMU 1(b): Container Storage Area	A	Raw material and product storage area. Containers stored in concrete-paved containment area fitted with berms and sloped to collection sump.
SWMU 1(c): Container Storage Area	C	Empty drum storage area. Cleaned drums stored on concrete pavement and gravel pavement awaiting off-site shredding and disposal.

- * - NOTES:
- A - This unit incorrectly identified as a SWMU in the PA.
 - B - Unit currently operational, potential for release(s) exists.
 - C - Unit currently operational, potential for release(s) is minimal.
 - D - Unit not currently operational, potential for past release(s) exists.
 - E - Unit not currently operational, potential for past release(s) is minimal.
 - F - This unit is currently undergoing investigation(s) or remedial action(s).

TABLE 1 (Continued)

**Ganes Chemicals, Inc.
Summary of Solid Waste Management Units
and Areas of Concern**

UNIT NUMBER AND NAME	STATUS*	SUMMARY/COMMENTS
SWMU 2: Aboveground Hazardous Waste Storage Tank	E	6,394-gallon fiberglass waste storage tank installed in 1988 for bulk storage of corrosive or spent solvent wastes. Tank in secondary containment berm sufficient to hold 110% of tank volume. Tank has been out of use since approximately 1990.
SWMU 3: Hazardous Waste Container Storage Area	C	Steel and polyethylene waste containers stored on concrete pavement sloped to wastewater treatment system collection trenches.

- * - NOTES:
- A - This unit incorrectly identified as a SWMU in the PA.
 - B - Unit currently operational, potential for release(s) exists.
 - C - Unit currently operational, potential for release(s) is minimal.
 - D - Unit not currently operational, potential for past release(s) exists.
 - E - Unit not currently operational, potential for past release(s) is minimal.
 - F - This unit is currently undergoing investigation(s) or remedial action(s).

TABLE 1 (Continued)

Ganes Chemicals, Inc.
Summary of Solid Waste Management Units
and Areas of Concern

UNIT NUMBER AND NAME	STATUS*	SUMMARY/COMMENTS
SWMU 4: Drum Cleaning Area	C	Empty drums formerly containing raw materials or hazardous wastes cleaned inside building over concrete-paved floors equipped with wastewater treatment system collection trenches. Drums are then steam-cleaned over drain leading to wastewater treatment system.

* - NOTES:

- A - This unit incorrectly identified as a SWMU in the PA.
- B - Unit currently operational, potential for release(s) exists.
- C - Unit currently operational, potential for release(s) is minimal.
- D - Unit not currently operational, potential for past release(s) exists.
- E - Unit not currently operational, potential for past release(s) is minimal.
- F - This unit is currently undergoing investigation(s) or remedial action(s).

TABLE 1 (Continued)

Ganes Chemicals, Inc.
Summary of Solid Waste Management Units
and Areas of Concern

UNIT NUMBER AND NAME	STATUS*	SUMMARY/COMMENTS
SWMU 5: Wastewater Treatment System	C	Treatment system consists of concrete- and tile-lined, chemically-sealed collection trenches pumped to a central collection sump, and includes below-grade neutralization and settling tanks. Wastewater is primarily non-contact cooling water and small quantities of process rinse waters containing salts and trace amounts of solvents. The treatment system is also used to manage small spills of hazardous materials and precipitation runoff in the outdoor work and storage areas. All process areas and outdoor work yards are concrete paved and sloped toward collection trenches. Discharge to sanitary sewer monitored under an industrial discharge permit.

- * - NOTES:
- A - This unit incorrectly identified as a SWMU in the PA.
 - B - Unit currently operational, potential for release(s) exists.
 - C - Unit currently operational, potential for release(s) is minimal.
 - D - Unit not currently operational, potential for past release(s) exists.
 - E - Unit not currently operational, potential for past release(s) is minimal.
 - F - This unit is currently undergoing investigation(s) or remedial action(s).

TABLE 1 (Continued)

Ganes Chemicals, Inc.
Summary of Solid Waste Management Units
and Areas of Concern

UNIT NUMBER AND NAME	STATUS*	SUMMARY/COMMENTS
SWMU 6: Solvent Distillation Units	C	All of facility's distillation units may be used for solvent recovery. There are no dedicated waste solvent stills. All distillation units are located inside process buildings over concrete-paved floors equipped with wastewater system collection trenches. Still bottoms are drummed and disposed off-site as hazardous waste.
SWMU 7: Satellite Accumulation Areas	C	Satellite accumulation areas located inside each of facility's twelve process rooms and in two areas in the outdoor work yard. All drums placed on concrete-paved areas equipped with wastewater treatment system collection trenches.

* - NOTES:

- A - This unit incorrectly identified as a SWMU in the PA.
- B - Unit currently operational, potential for release(s) exists.
- C - Unit currently operational, potential for release(s) is minimal.
- D - Unit not currently operational, potential for past release(s) exists.
- E - Unit not currently operational, potential for past release(s) is minimal.
- F - This unit is currently undergoing investigation(s) or remedial action(s).

TABLE 1 (Continued)

**Ganes Chemicals, Inc.
Summary of Solid Waste Management Units
and Areas of Concern**

UNIT NUMBER AND NAME	STATUS*	SUMMARY/COMMENTS
AOC A: Soil Pile	E	Soil pile associated with underground toluene storage tank removal/replacement in 1990. Subsequent testing of soil pile revealed no contamination. Soil was disposed off-site.
AOC B: Fuel Oil Leak	B	Fuel oil soil and water contamination noted during underground tank replacement in 1987. All contaminated material was removed, new double-walled tank was installed, and the area was backfilled with clean material and resurfaced with concrete.

- * - NOTES:
- A - This unit incorrectly identified as a SWMU in the PA.
 - B - Unit currently operational, potential for release(s) exists.
 - C - Unit currently operational, potential for release(s) is minimal.
 - D - Unit not currently operational, potential for past release(s) exists.
 - E - Unit not currently operational, potential for past release(s) is minimal.
 - F - This unit is currently undergoing investigation(s) or remedial action(s).

TABLE 1 (Continued)

**Ganes Chemicals, Inc.
Summary of Solid Waste Management Units
and Areas of Concern**

UNIT NUMBER AND NAME	STATUS*	SUMMARY/COMMENTS
AOC C: Air Releases	C	Two atmospheric releases from process equipment in 1988 due to mechanical error and operator inexperience. Mechanical error corrected by adding vapor scrubber and supplemental training provided to offset operator errors. Facility maintains several corrosive and organic vapor air scrubbers. Atmospheric releases from new and upgraded equipment monitored under NJDEP air permits.
AOC D: Toluene Tank Removal Site	C	Toluene contamination noted during 1990 removal/replacement of raw material underground storage tank. All toluene contaminated soil excavated to 0.2 ppm. Soil pile was tested and found to be free of contamination and was disposed off-site.

*** - NOTES:**

- A - This unit incorrectly identified as a SWMU in the PA.
- B - Unit currently operational, potential for release(s) exists.
- C - Unit currently operational, potential for release(s) is minimal.
- D - Unit not currently operational, potential for past release(s) exists.
- E - Unit not currently operational, potential for past release(s) is minimal.
- F - This unit is currently undergoing investigation(s) or remedial action(s).

VIII. REFERENCES

1. A.T. Kearney, Inc., Field Inspection Logbook, March 13, 1992, pp. 19-24.
2. A.T. Kearney, Inc., Photograph Logbook, March 13, 1992, pp. 53-73.
3. A.T. Kearney, Inc., Telephone communication with Mr. William Melofchik, March 18, 1992.
4. NUS Corporation, "Final Draft, Preliminary Assessment, Ganes Chemicals Incorporated, Carlstadt, New Jersey," April 27, 1990.

Appendix A

Visual Site Inspection Field Notebook

* JAMES CHEMICAL, INC. 3/13/92

Facility Representative: William Mielochuk, Mgr of ^{Environmental} ~~Env~~ Affairs

E-30 Waste Generated =

Pharmaceuticals / Pharm. By-Products / Solvents

Produce Bulk Pharmaceutical
→ Registered on FDA

(No dosage ^{from} medicinal
usually white crystalline
solids (1990's)
→ liquid products

Solvents Used:

Methanol

Ethanol

iso-propanol

Toluene

MEK

Acetic Acid

Diethyl ether

Acetone

THF

MBK

History: Started 1929 with one manufacturing building
Produced barbiturates until 1943
Moved to ~~PA~~ plant for security reasons.
Penzil(?)

Acquired adjacent (office) bldg in 1930's
Raw Materials Warehouse purchased in 1940's

Ship waste off-site when 90-100 drums accumulate
(about 1/month shipment)

Purchased other ^{equipment & storage} warehouse 10 years ago & surrounding block
built new administrative building in last 2 yrs

Have wastewater settling tank - emptied ~ 1/year
 about 4 drums sludge
 Sludge contains Chloroform / methylene chloride - characterized
 Sent off-site for incineration.

Have 3 weeks shut down for major maintenance
 in Summer. Clean boilers, sumps, any concrete
 work, settling tank.

Registered tanks - fuel oil (15,000 galls)
 alcohol (800 galls) } raw material
 (2) caustic (8000 gal) } double-walled
 toluene (2000 gal) } stainless steel
 acetic anhydride (500 gal)

Installed w/in 2-6 years ago - replaced older tanks

Tested all soils when replacing old tanks
 to ensure that all soils were cleaned.

- All ^{small} spills are reported ^{to NJDEP & local agencies} as necessary & are inside
 tide in concrete floors - spills collected in wastewater
 trenches & pumped out into drums for disposal.

All trenches empty ^{if necessary} into wastewater storage tank ^{flow} can
 be shut off so ^{wastewater tank} ~~trenches~~ can be manually emptied.

Air Permits - Looking to get one facility ^{wide} batch plant air permit
 as opposed to a process by process source permitting

Have scrubbers - ^{aqueous ammonia} wastes are put into wastewater
 system.

Solvent scrubbers are ~~are~~ distilled & ^{still bottoms are} put into
 waste solvent drums & disposed off-site.

- Soil piles previously noted by NYS was from
 toluene tank replacement. Soil was tested &
 found clean & shipped off-site.

9.15

Stark TourFinishing Room:

Rinseout kettles - separation centrifuge = typical ^{process} equipment

Waste Solvents used are drummed & taken immediately to storage. Concrete Floor 3 are in good condition

Corroded ^{separated} material is removed & stored on ^{to be reused in mfr. process} concrete pad - Seams in concrete pad. Drums all in good condition, labelled, & closed.

Solvent accumulation area - in process room
Waste removed from dryers is put into drums.
Left open during use (bump hole opened).
On concrete floor inside bldg. Trenches nearby leading to wastewater system.

Process filters are ^{cleaned & residues are} ~~changed & disposed~~ off site as haz. waste.
Residues may contain carbon, chemical precipitates, & small quantities of solvents.

Haz Waste Drum Storage Area

Highpurity & metal drums
Pumped out periodically by TSD shipper. ^{also backs}
Rust stains on concrete - but ^{no cracks} good condition. ^{Trailer adjacent to area.}
No 2nd containment ^{directly}
Waste water drain system, down slope from area. Area sloped to this drainage.

→ Area is over 15,000 gallon oil storage tank.

Drum Cleaning Area: Inside bldg.

Solvents added to drums & pumped out

Drums awaiting cleaning are stored in concrete paved alleyway to east of haz. waste storage area.

RERA-uptr [^] Drums are then skim cleaned over drain leading to waste water system, & drums are reused.

Drums are replaced when over weakness due to corrosion are surface

Haz. Waste Storage Tank - North Sinals

Has been used in 2 years.

~ 5' concrete berm, 18" high
Material pumped from drums into tank.

Pit #1 - Most Haz. Material used here

3' thick to recover solvent.

Mechanical reuse - shell bottoms drummed.

Concrete flooring in good condition - seams

All spills flushed into wastewater treatment system

Raw Materials Storage Area:

Concrete pad - in good condition

Curbing on 3 sides

Sloped to sunny side NW corner.

Drums stacked 2-high on pallets - all labelled & in good condition

Empty drum storage area to North of this area - concrete pad in good condition
Drums are shipped off site for shredding.

Warehouse:

Raw Materials storage

Finished product storage

Concrete paved - good condition

No history of releases

Many new, empty drums for product storage

Oil Storage Tank

15,000-gallon replaced a few years ago. pit was
contaminated soil was all excavated & tested
clean. New tank was installed w/ clean backfill.
New concrete paving on top installed. Tank
underlies haz. waste storage area

Satellite Accumulation

2 lab accumulation drums (outside) ^{polyethylene}
 ~ 12 drums in room accumulation drums ^{trenches down slope}

- waste are accumulated in small bottles in each lab area & then transferred to drums stored outside.
- Each process area has ~ 1 drum to contain spill bottoms.

Interim System

Polypropylene tank ^{5" thick}
 inside of concrete containment
 Cleaned out ~ 1/year

Neutralization System - ^{to adjust} Step prior to entering polyethylene tank above

adjust pH
 to adjust pH { Sulfuric acid tank outside
 tank sulfuric acid tank inside adjacent
 Drums from cleaning over drain in the area which enters into neutralization system

Have Industrial Wastewater NJDES Permit - (expired) - to discharge to Sanitary Sewer

BOD
 COD
 TSS
 Petroleum Hydrocarbons
 VOC

Monitoring Parameters

Have been sampling both for NJDES & Bergen Co. permit requirements.

will be assumed
 Permit, Bergen Co. Utility Authority
 NJDES - will not be renewed because sewer system is now able to take over permitting & monitoring.
 expired 2 years ago still doing sampling
 have been waiting for action from State

State has proposed that Utility Co. take over permitting of industrial facilities.

Flow Volume ~~low~~ 110,000 - 200,000 gallons per day
 (includes rain - contact cooling waters)

Actual process waters ~ 10,000 gallons.

Have an emergency - open head 10,000 gallon tank
~~Drawn~~ → never had to pump out system due to spill

Trenches: concrete trenches ~1' wide x ~1' deep

Terra Loka pipe (1/2 pipe) (27)

Whole system is then epoxy sealed
 or silicone sealed

- Haz. Waste Storage Area - in use at least
 - last 11 years - has always been there to knowledge.
 New concrete replaced where oil tank
 replaced.

- Info Requirements: Schematic of wastewater trenches &
 system

10:40 Close Out Meeting

11:00 Leave Site

3-13-92

JK-GANES

053

0825 ARRIVE AT GANES
CHEMICAL AND PREP
FOR MEETING WITH

WILLIAM MELOFCHIK

PERSONNEL

H. SEWERS

J. KOEHNEN

UPON ARRIVAL IN AREA WE
IMMEDIATELY NOTICED A VERY
LARGE QUANTITY OF DRUMS

0840 MEET W/ WILLIAM M.

- USE OF STAND SOLVENTS
W/ WHICH DO NOT CHANGE
DUE TO GOVT (FDA)

3-13-92

GANES

054

PHARM & PHARM BY
PRODUCTS
SOLVENTS

NOTE:

THE AREA HAS SEVERAL
ORGANIC CONSTITUENTS
AND DOES NOT ALLOW
FOR PHOTOS IN MANY
AREAS

3-13-92	GANES	OSS
SOIL ON GARDEN ST		
WAST FROM TOLUENE		
TANK REMOVAL		
- TAKEN AWAY AS NON-HAZ WASTES		
0920 INSPECTION BEANS		
COMP		
WHITE CR		
1732 M/LINE & BLENDING ROOM		
0927 SAT ACCUMULATION IN DRYING ROOM		

3-13-92	GANES	OSS
METH, ETH, IPA, TOL, MIX		
ACETIC ACID, DI		
ACETONE, THF, MER		
- 63 rd YEAR OF OPERATION		
- JUNE JULY SHUTDOWN 3 - WEEKS		
• BOILERS		
• SUMPS		
• CONC WORK		
• SETTLING TANKS		
• 15,000 GAL FUEL OIL		
3- 60,000 (CAUSTIC, ALCOHOL TOL)		
2,000		
5,000 ACETIC ANHYDRIDE		
(INSTALLED 2-6 YRS AGO)		
15,000 GAL OIL TANK		
REMOVAL, CLEANED		

058

GANES

3-13-92

057

GANES

3-13-92

U.S.T AREA

0:30 DRUM STORAGE

AREA w/ A FEW DRUMS
OF HW AND SEVERAL
EMPTY DRUMS READY
FOR CLEANING AND REUSE
(CHECK FOR PHOTO)

0:37 FILL TANK. 10/SEC
CONT LOOKS ADEQ

0945 ROOM 17

SAT ACCUM

NOTE ONLY 3 LIQUID
PRODUCTS ON SITE
ALL OTHERS

3-13-92

GAMES

059

0947 HM PROD/USE
ROOM 8

CONSIDERED WORST
ROOM (HM USE) AT
FACILITY

C 7157

1-1

1-1

1-2

PRODUCT DRUM STORAGE

AREA, (1-1) SHOWING WEST
SITE OF AREA, WITH CONT
SUMP AT REAR OF AREA,
PHOTO (1-2) OF PRODUCT.
DRUM STORAGE

3-13-92

GAMES

060

A NOTE: DUE TO THE POTENTIAL
THE
VOLUME OF PICTURES FROM
PHOTO'S FROM
REMAINING ROLL
THE HERMETIC
USED.

PI. 1

AOPZ

31392

GAVES

061

1001

PHOTO 1-3

3 DIST'S (1 CRUSTIC
AND 2 ALCOHOL)

REP TO B 3-6000 GALL
TANKS

1002

PHOTO 1-34

HOW STORAGE TANK

MADE OF POLY MATERIAL

AND WITHIN ADEQUATE

CONTAINMENT. THIS UNIT

IS NO LONGER IN USE

(~2 YRS + AGO)

CONT ~3' HIGH w/ OVERFLOW

TO ADD CONTAINMENT

062

1392

3ANES

063

1003

PHOTOS 1-5

1-6

CONTAINER STORAGE

AND UST OIL TANK

MANY OF THE DRUMS ARE
STAGED HERE FOR CLEANING
AND REUSE (NOT REE)

1005

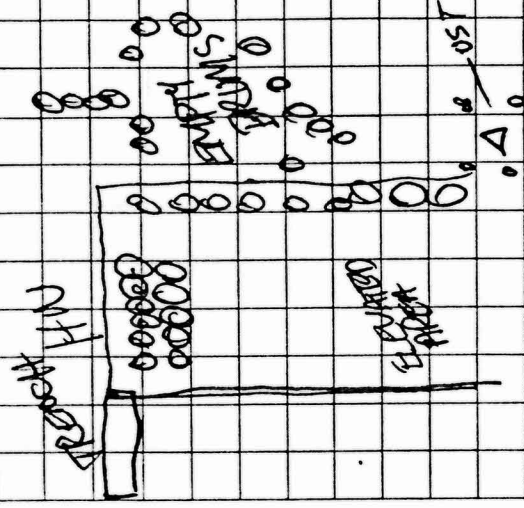
PHOTO 1-7

UST -TOLUENE

TANK IS APPROX 2,000
GALLONS AND HAS

BEEN REPLACED
RECENTLY

064



065

GAVER

3-13-92

010710

1-8 (New Roll)

LOOKING EAST AT

USTS: USTS w/ COND
OVER.

6-1 210712

6-9

PHOTO (LOOKING WEST)

AT SAT Accumulation

AREA FOR LAB. NOTE

BLUE DRUM WHICH ACCUM

MATERIALS FROM VAR LADS

PHOTO 1-10

1-10

ALNO5 ON17007

AT TANK. (PRODUCT TANK)

NO DISEASE (yet) OR

CONT AROUND TANK

068

GAVES

3-13-92

067

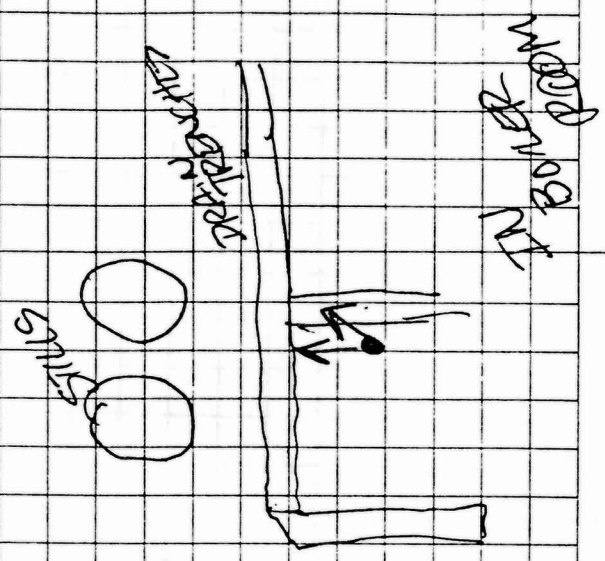
GAVES

3-13-92

1012 PHOTO 1-11
LOOKING AT A "TYPICAL"
SATELLITE ACCUMULATION
AREA, OVER CONC. NO SECCANT
- SEVERAL SAT ACCUM AREAS
ON SITE
- 2 LAB SAT ACCUM AREAS

1017 PHOTOS 1-12
1-13
PHOTO OF FRACTIONATIONS
STILLS AND IN BUILDING
DRAINAGE TRENCHES

(FINISHED PRODUCT)
(REQ COPY OF TRENCH
SCHEMATIC)



0670

CAVES

3-13-92

089

GAIVES

31392

10:20 74070 41-14

PICTURE OF WASTE

CONTRINEMENT TANK

LOOKING DOWN INTO
UNIT (ENERG CONT)

UNIT (EMERG CONT)

1022 PHOTO 1-15

DRAINAGE TRENCH

$$137.5 \text{ m} \cdot 1 \text{ X} \cdot 1 \approx$$

Q2ATL

ic24 PHOTOS 1-16

177

PHOTO OF NEUTRALIZATION

UNIT LOOKING AT UPSIDE DOWN.

DRUM (1-16) #NO

3-13-92

GAMES

071

1028

2007 JULY 10 - OUR MEETING

- WW MONITORING

551
207

581

105

424

FOR DISHARGE TO THE

BERGEN COUNTY &

ADDP (WIPERS) P0710

TO BE TAKEN OVER BY

BERGEN COUNTY (TO LOSE
NOTICE PERMIT)

ADDS PERMIT

200'000 - 200,000

(odd odd)

QAD

PROCESS & NON-CONTACT

COOLING WATER

072

GAVES

373-92

3-13-92

GAMES

073

1035 10035097 MTH DOWN TUBES

ENERG CONT SYST

HAS $\approx 10,000$ GAL

1050 CLOSE OUT MEETING

COMPLETED

-PREP FOR LEAVE SITE

1100 LEAVING GAMES SITE

074

TELEPHONE LOG

INITIATED BY A. Selles DATE 3/8/92
TO William Melofchuk - Mgr. of Environmental Affairs
PHONE NO. 201-507-4300 FILE NO. 6888/R02-32-01
SUBJECT/REFERENCE Eanes Chemicals

SUMMARY

Addition info needed to complete VSI. Questions on
attached pages were asked.

ACTION REQUIRED:

CC: _____

DISCUSS W/

FILE AND CHRONO
MISC. _____

Games

1) Product storage area outside of Finishing room.

How long has it been a practice to store drums in this area? ^{year there} ~1 week long term practice

Any spills occurred in this outside storage area?

No

2) Product storage area near warehouse on Garden Street.

Has containment area been sealed?

Any spills occurred in this area? No

When was containment system installed? ~1990

What was condition of area before? Concrete? Gravel? Always a concrete pad

~~Empty drum storage area~~

Has this area always been used as product storage? ^{ever waste storage?} No ^{only raw material & products}

3) Empty drum storage area along Garden Street?

How long used for empty drum storage? At least 11 years

Has concrete pad always been present - or is that a more recent installation? ^{hydrogen cylinders - full & empties} Part recently installed

Any incidents of spills of residuals in drums? All cleaned before but out for storage

4) Aboveground waste storage tank.

When installed? ^{made} Any previous uses? No

Any ~~waste~~ spills associated with tank? No

5) Other aboveground tanks? Any spills? No

Approx. how old?
Materials of construction?

- ~~Did any of the tanks~~
 Did any tanks besides fuel tank leak when removed?
- de minimus from
 blue tank
 removed soil to
 .2 ppm level
- 6) Are underground storage tanks equipped with a leak detection system (i.e. alarms)?
- Any idea when original tanks were installed? Some going back to installing leak detect before 1992
- Any probs with leaks?
- 7) When was ^{new} 15,000-gallon fuel oil tank installed?
- if much after 1987 - where were haz. waste containers temporarily stored? All ^{replacement work completed} during 3 week period shut-down. Contamination removed to non-detectable level
- 8) Have any spills occurred in haz. waste container storage area? No minor drum leaks - cleaned up immediately area inspected once per shift for any leaks
- 9) When was wastewater treatment system installed? ^{since 1929} ^{repaired concrete}
- Some reconstructed & periodically repaired? upgraded? settling tank recently refurbished ~2 yrs.
- What was practice prior to installation?
 - Type of container wastewater neutralization is performed in? concrete wood surrounded concrete ~10,000 ⁵⁰⁰⁰ galls.
 - Not clear what are the process waters generated that are discharged at ~10,000 gallons per day.
- Splits from process. Rinse product to remove solvent residuals & salts. First heat waters to remove majority of solvents which & treated as ^{haz.} waste. Wash water discharged to wastewater treatment system
- 10) Any idea what Ganes did w/ ^{waste} chemicals prior to their being regulated? Always shipped off-site

Appendix B

Photograph Log

Photograph Log



Photo No.: 1-1
Date: March 13, 1992

Direction: NE
Time: 0957

Description: Raw material and product storage area. Note containment curbing and secondary containment sump in far corner. Empty polyethylene drums stored on adjacent gravel paved area.



Photo No.: 1-2
Date: March 13, 1992

Direction: NW
Time: 0957

Description: Raw material and product storage area. Concrete slab sloped to northwest corner containment sump (not visible).



Photo No.: 1-15
Date: March 13, 1992

Direction: S
Time: 1022

Description: View of typical process area wastewater treatment system concrete and terra cotta tile lined collection trench. Dimensions approximately 1-foot wide by 1-foot deep.



Photo No.: 1-16
Date: March 13, 1992

Direction: NE
Time: 1024

Description: Steam-cleaning area for empty drums formerly containing hazardous waste. Cleaning performed over drain associated with wastewater treatment system.

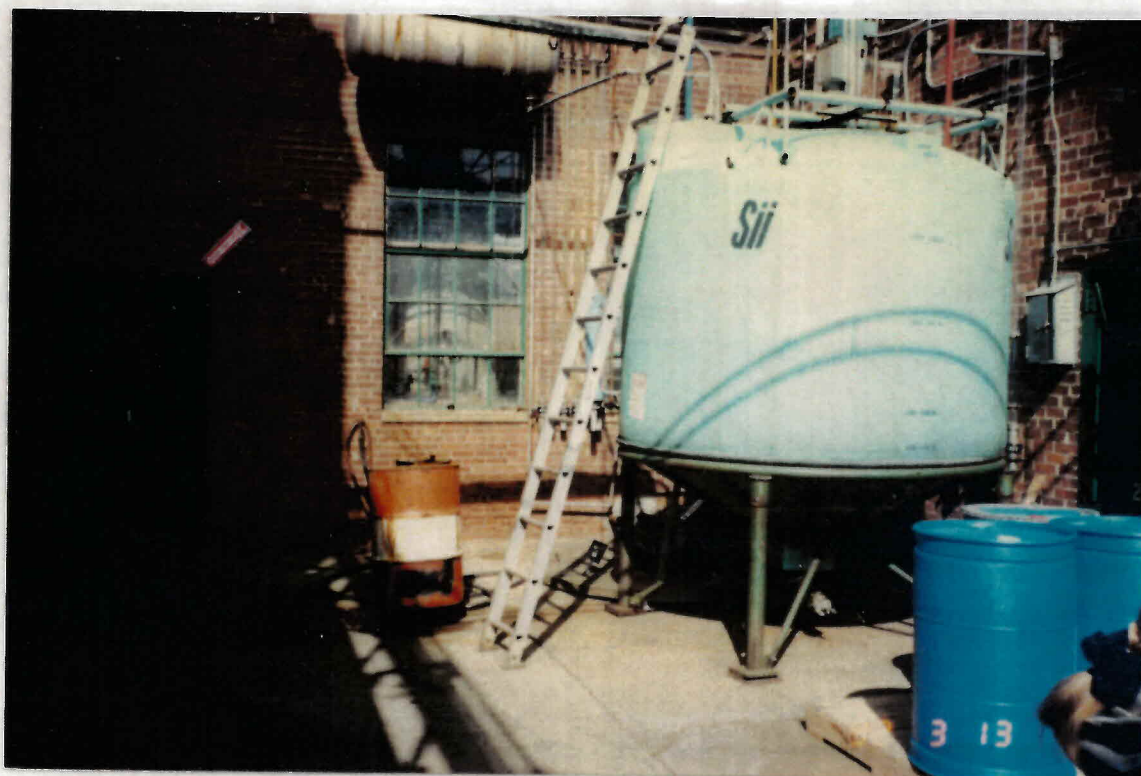


Photo No.: 1-17
Date: March 13, 1992

Direction: SW
Time: 1024

Description: Wastewater system neutralization area. Underground 5,000-gallon neutralization tank is beneath wooden cover (behind green tank). Aboveground tank contains acid for pH adjustment. Associated alkaline pH adjustment tank located in building at right side of photo.



Photo No.: 1-13
Date: March 13, 1992

Direction: W
Time: 1017

Description: View of typical wastewater collection trenches running throughout all manufacturing process areas. Trenches may be steel plate or grate covered.



Photo No.: 1-14
Date: March 13, 1992

Direction: SW
Time: 1020

Description: Wastewater treatment system 5,000-gallon polyethylene settling tank. Tank is final collection point prior to discharge to local sanitary sewer system.



Photo No.: 1-11
Date: March 13, 1992

Direction: NNE
Time: 1012

Description: Typical satellite accumulation drum for process area. Moisture around drum is water from cleaning floor. Note grated wastewater collection trench at doorway (typical) to intercept spills in process area.

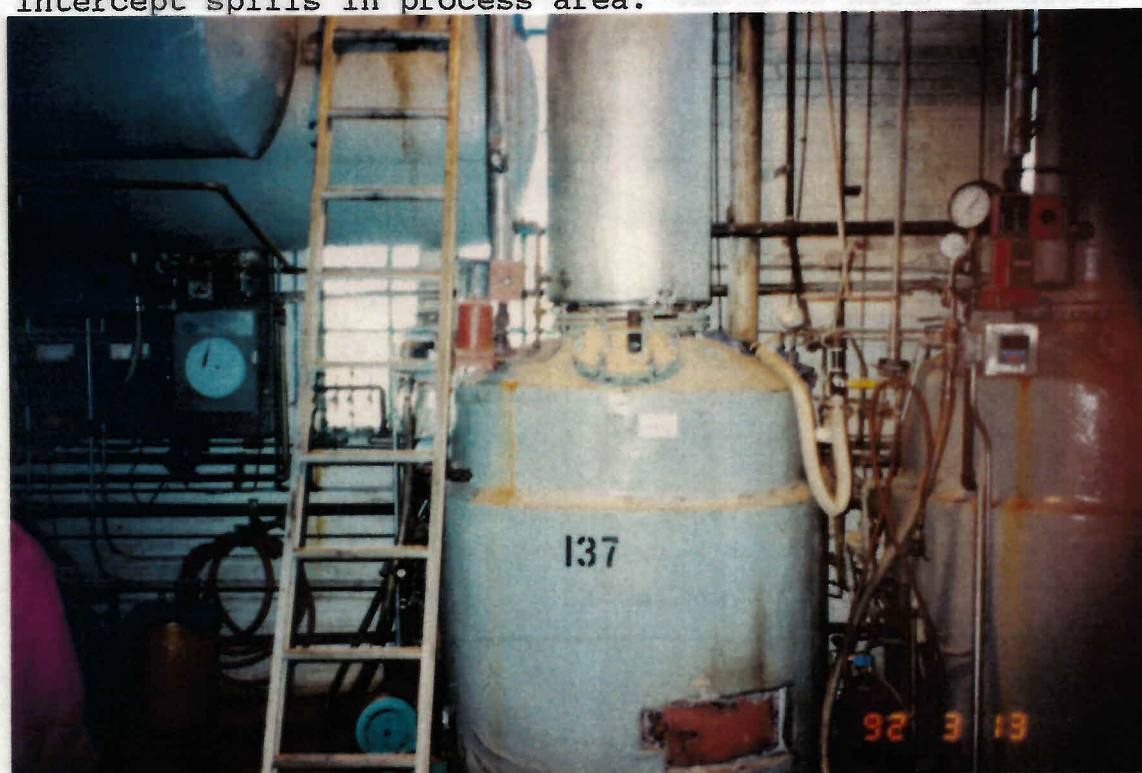


Photo No.: 1-12
Date: March 13, 1992

Direction: W
Time: 1017

Description: Typical fractionating still (example of older equipment). Waste still bottoms removed from hatch at top of still. Note solvent recovery tanks in upper left corner of photo.

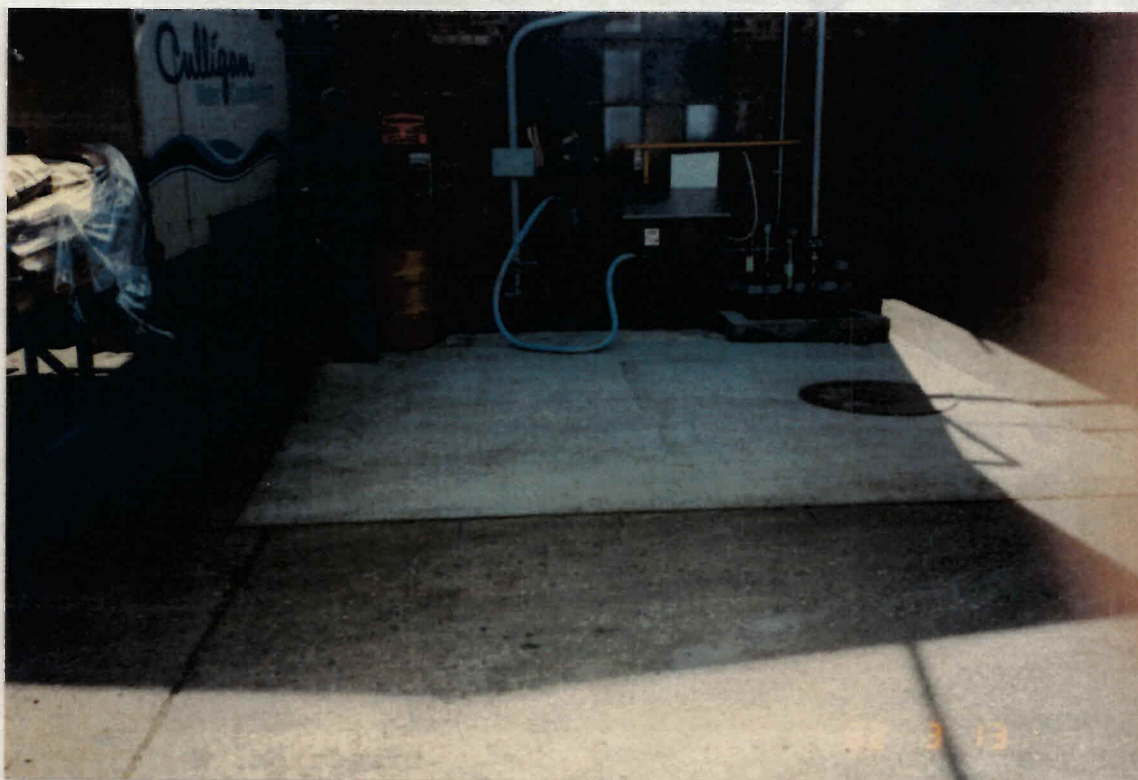


Photo No.: 1-7
Date: March 13, 1992

Direction: E
Time: 1005

Description: Site of 2,000-gallon underground toluene product storage tank replaced in 1990.



Photo No.: 1-8
Date: March 13, 1992

Direction: E
Time: 1008

Description: Site of 5,000-gallon acetic anhydride product storage tank. Area above tank used for parts and scrap material storage.



Photo No.: 1-9
Date: March 13, 1992

Direction: W
Time: 1009

Description: One of two satellite accumulation drums for laboratory waste (labs at right side of photo). Wastewater collection trench at end of driveway to intercept spills.

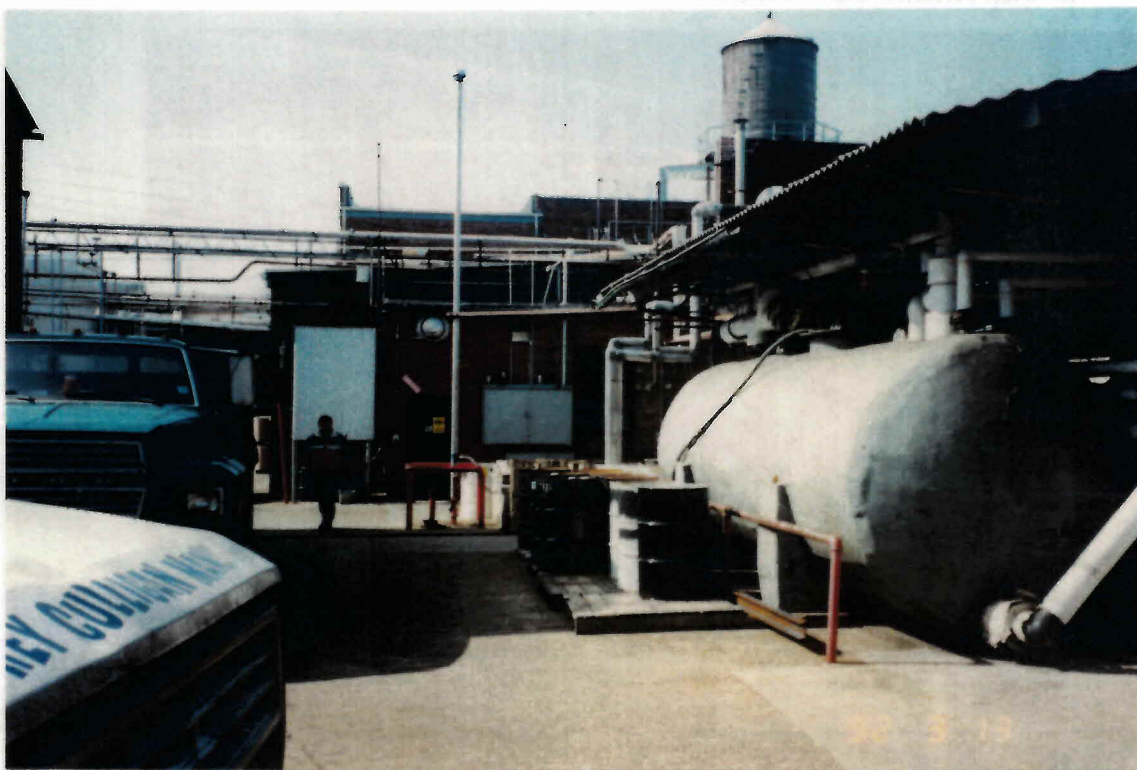


Photo No.: 1-10
Date: March 13, 1992

Direction: S
Time: 1010

Description: View of courtyard work area. Tank and drums contain raw materials. Note grated wastewater system collection trench (center of photo) to intercept runoff or spills.



Photo No.: 1-5
Date: March 13, 1992

Direction: NW
Time: 1003

Description: Hazardous waste container storage area. Concrete pavement sloped to grated wastewater treatment system collection trench (at left side of photo).



Photo No.: 1-6
Date: March 13, 1992

Direction: N
Time: 1003

Description: 15,000-gallon underground fuel oil storage tank fill pipe and tank vent. Tank, which was replaced in 1987, underlies hazardous waste container storage area.



Photo No.: 1-3
Date: March 13, 1992

Direction: NW
Time: 1001

Description: Site of three 6,000-gallon underground product storage tanks (for caustic and alcohol storage).



Photo No.: 1-4
Date: March 13, 1992

Direction: NNE
Time: 1002

Description: 6,394-gallon fiberglass hazardous waste storage tank in secondary concrete containment berm. Tank was empty at time of VSI.

I.D. - FOR OFFICIAL USE ONLY

S	W	N	J	D	0	0	1	2	1	3	7	2	7	2	1	
1	2													13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 3 23 - 26 7 23 - 26	2 F 0 0 5 23 - 26 8 23 - 26	3 23 - 26 9 23 - 26	4 23 - 26 10 23 - 26	5 23 - 26 11 23 - 26	6 23 - 26 12 23 - 26
---	---	------------------------------	-------------------------------	-------------------------------	-------------------------------

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26 19 23 - 26 25 23 - 26	14 23 - 26 20 23 - 26 26 23 - 26	15 23 - 26 21 23 - 26 27 23 - 26	16 23 - 26 22 23 - 26 28 23 - 26	17 23 - 26 23 23 - 26 29 23 - 26	18 23 - 26 24 23 - 26 30 23 - 26
---	---	---	---	---	---

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P 0 5 3 23 - 26 37 U 0 8 0 23 - 26 43 U 1 8 8 23 - 26	32 P 1 0 6 23 - 26 38 U 0 9 2 23 - 26 44 U 2 2 0 23 - 26	33 U 0 0 1 23 - 26 39 U 1 1 7 23 - 26 45 23 - 26	34 U 0 0 2 23 - 26 40 U 1 5 4 23 - 26 46 23 - 26	35 U 0 0 3 23 - 26 41 U 1 5 9 23 - 26 47 23 - 26	36 U 0 1 2 23 - 26 42 U 1 6 1 23 - 26 48 23 - 26
--	--	---	---	---	---

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.


49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
---------------	---------------	---------------	---------------	---------------	---------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)☒ 2. CORROSIVE
(D002)☒ 3. REACTIVE
(D003)☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) C.O. Engeler, Ph.D. Vice, President	DATE SIGNED July 8, 1980
---	---	-----------------------------

EPA Form 8700-12 (6-80) REVERSE

ap

COMPANY NAME: *Carves Chemicals, Inc.*

HWC REVIEW DATE: *9/21/90*

FACILITY LOCATION: *611-641*

COUNTY: *Bergen*

STATE: *NJ.*

REVIEWER'S NAME: *Carlastadt 07072*

ID NO. *NJD001213727*

PA REPORT DATE: *4/27/90*

COMPANY MANUFACTURING OPERATION DESCRIPTION AND DURATION OF OPERATION: *1929 → date:*

Company manufacture pharmaceutical products.

HAZARDOUS WASTE GENERATED: *sodium cyanide, spent halogenated solvents, spent non-halogenated solvents, acetaldehyde, acetone, dinitrotrinitro, aniline, bromophenyl phenyl ether, methanamines, etc.*

REGULATORY STATUS: *interim TSD delisted in 1983 to generator only status (wastes contained and stored < 90 days).*

REGULATED UNITS ON SITE:

- ① container (drum) storage*
- ② above ground tank storage*

SOLID WASTE MANAGEMENT UNITS ON SITE (pre-Nov. 19, 1980):

NATURE OF ANY RELEASES:

RELEASE INFORMATION-BY SOLID WASTE MANAGEMENT UNIT/REGULATED UNIT:

two small isolated releases of product from production facility;
soil pile (covered) outside on gravel; unknown if contaminated.
oil from removed & underground storage tank observed.
no other releases reported.

ENVIRONMENTAL SETTING AND IMPACTS:

- RESIDENTIAL *nearby*
- INDUSTRIAL *zone area zoned commercial/industrial.*
- GROUNDWATER USE (drinking water supply, sole source aquifer, etc.)
virtually no groundwater use for potable supply; used for industrial and commercial purposes.
- SURFACEWATER *drainage from unbermed storage area (drum) could go by way of storm drain to Berey's Creek and the Hackensack River.*
- SOIL AND AIR

INVOLVEMENT OF OTHER REGULATORY AGENCIES/PROGRAMS:

COMMENTS:

some drums stored on unconfined gravel beds; some drums in poor condition. If release occurs, high potential for entering surface water system.

RECOMMENDATION FOR FURTHER ACTION, INCLUDING PRIORITY:

No further remedial action planned based on generator only status and lack of reported release systematic releases.

State of New Jersey
Department of Environmental Protection and Energy
Manifest Section
CN 028, 401 East State Street
Trenton, New Jersey 08625-0028

U.S. EPA
AGENCY RO II
99 DEC 30 PM 3:07
HAZARDOUS & SOLID WASTE
PROGRAMS
BRANCH

"Request to Deactivate EPA ID Number"

EPA ID No. NJD001213727

Company Name: Ganes Chemicals Inc.

Site Address: 611-641 Broad Street Carlstadt
(street) (city / town)
~~XXXXXXXXXX~~ New Jersey 07072 10 18,19
(state) (zip code) (lot) (block)

Mailing Address: 630 Broad Street Carlstadt
(street / p.o. box) (city / town)
New Jersey 07072
(state) (zip code)


Company Contact: Roman M. Pazdro (201) 507-4333
(name) (area code and phone number)

Reasons for deactivating EPA ID No. (Check all appropriate boxes.)

- ☐ The EPA ID number was obtained for a one time cleanup which is completed.
- ☐ The site has completed an ECRA cleanup (indicate ECRA Case # _____).
- ☒ Other Facility ownership is being transferred to Novus Fine Chemicals L.L.C.
on 12/31/99.

Is the site presently occupied? (circle yes or no)

Sign and date the application below, and retain the last page (pink copy) for your records.

Roman M. Pazdro 
(printed name) (signature)
Manager, Environmental Affairs 12/23/99
(title) (date)

Submission of false information is a violation of N.J.A.C. 7:26-5.6 and N.J.A.C. 7:26-7.3.

copies: White - Manifest Section
Yellow - USEPA Region II
Pink - Applicant

UC 12/30/99 HR-1N7

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. Initial Notification

☒
B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

N J D 0 0 1 2 1 3 7 2 7

II. Name of Installation (Include company and specific site name)

N O V U S F I N E C H E M I C A L S L L C

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

6 1 1 - 6 4 1 B R O A D S T R E E T

Street (Continued)

City or Town

C A R L S T A D T

State

Zip Code

N J

0 7 0 7 2 -

County Code

County Name

B E R G E N

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

4 2 6 O R C H A R D S T R E E T

City or Town

C A R L S T A D T

State

Zip Code

N J

0 7 0 7 2 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

K U L K A R N I

A M O L

Job Title

Phone Number (Area Code and Number)

V I C E - P R E S I D E N T

2 0 1 - 5 0 7 - 4 3 4 3

VI. Installation Contact Address (See Instructions)

A. Contact Address

Location

Mailing

☐
☒

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

N O V U S F I N E C H E M I C A L S L L C

Street, P.O. Box, or Route Number

4 2 6 O R C H A R D S T R E E T

City or Town

C A R L S T A D T

State

Zip Code

N J

0 7 0 7 2 -

Phone Number (Area Code and Number)

2 0 1 - 5 0 7 - 4 3 2 7

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

X

No

(Date Changed)

Month

Day

Year

1

2

3

1

9

9

[illegible]

A. Hazardous Waste Activity	B. Used Oil Recycling Activities
-----------------------------	----------------------------------

B. Used Oil Recycling Activities

1. **Used Oil Recycling Marketer**
 - ☐ a. **Marketer Directs Shipment of Used Oil to Off-Specification Burner**
 - ☐ b. **Marketer Who First Claims the Used Oil Meets the Specifications**
2. **Used Oil Burner - Indicate Type(s) of Combustion Device**
 - ☐ a. **Utility Boiler**
 - ☐ b. **Industrial Boiler**
 - ☐ c. **Industrial Furnace**
3. **Used Oil Transporter - Indicate Type(s) of Combustion Device(s)**
 - a. **Transporter**
 - b. **Transfer Facility**
4. **Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)**
 - ☐ a. **Process**
 - ☐ b. **Re-refine**

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

- B. Listed Hazardous Wastes.** (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

X. Certification

Signature 	Name and Official Title (Type or print) Joseph V. Fusco President	Date Signed 12/23/99
--	--	-------------------------

EPA Form 8700-12 (Rev. 10/09/96)

GANES CHEMICALS

GANES CHEMICALS INC.
630 BROAD STREET
CARLSTADT, NJ 07072
TELEPHONE: (201) 507-4300
TELEFAX: (201) 507-1930

U.S. EPA
AGENCY R0 II
99 DEC 30 PM 3:07
HAZARDOUS & SOLID WASTE
PROGRAMS BRANCH

December 23, 1999

CM RR# Z-470-318-006
NJDEP
Manifest Section
401 East State Street
P.O. Box 421
Trenton, NJ 08625-0421

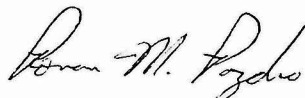
Re: EPA ID No. NJD001213727
611-641 Broad Street
Carlstadt, NJ 07072

Dear Sir,


The ownership of the facility referenced above is changing ownership on December 31, 1999 from Ganes Chemicals Inc. to Novus Fine Chemicals L.L.C. Please find enclosed a copy of EPA Form 8700-12 "Notification of Regulated Waste Activity" and New Jersey's Form HWR-001 "Request to Deactivate EPA ID Number".

Please feel free to call me at (201) 507-4333, if you need additional information.

Sincerely,



Roman M. Pazdro
Manager, Environmental Affairs

deactivated
12-28-99




**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•JED001213727

INSTALLATION ADDRESS

GENES CHEMICAL INC
611-641 BROAD STREET
CARLSTADT,

NJ 07072

611-641 BROAD STREET
CARLSTADT,

NJ 07072



**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

10/09/80

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER →	NJD001213727
INSTALLATION NAME →	NOVUS FINE CHEMICALS LLC
INSTALLATION ADDRESS →	611-641 BROAD ST CARLSTADT, NJ 07072-1198
MAILING ADDRESS →	426 ORCHARD ST CARLSTADT, NJ 07072

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY, 22nd Floor
NEW YORK, NEW YORK 10007-1866

ATTN: DIV OF ENVIRON PLANNING & PROTECTION
RCRA PROGRAMS BRANCH

**TO: KULKARNI, AMOL
VICE PRES
426 ORCHARD ST
CARLSTADT, NJ 07072**



I.D. - FOR OFFICIAL USE ONLY															
S	W	M	J	D	0	0	1	2	1	3	7	2	7	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 3 23 - 26	2 F 0 0 5 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P 0 5 3 23 - 26	32 P 1 0 6 23 - 26	33 U 0 0 1 23 - 26	34 U 0 0 2 23 - 26	35 U 0 0 3 23 - 26	36 U 0 1 2 23 - 26
37 U 0 8 0 23 - 26	38 U 0 9 2 23 - 26	39 U 1 1 7 23 - 26	40 U 1 5 4 23 - 26	41 U 1 5 9 23 - 26	42 U 1 6 1 23 - 26
43 U 1 8 8 23 - 26	44 U 2 2 0 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
---------------	---------------	---------------	---------------	---------------	---------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

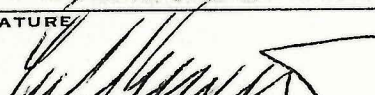
☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) C.O. Engeler, Ph.D. Vice, President	DATE SIGNED July 8, 1980
--	---	-----------------------------

EPA Form 8700-12 (6-80) REVERSE

P106 - Sodium Cyanide

U001 - Acetaldehyde

U220 - Toluene

U092 - Dimethylamine

V117 - 1,1' Oxybis-Ethane

~~U001 - Acetaldehyde~~

ap

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. Initial Notification

☒

B. Subsequent Notification
(Complete item C)

C. Installation's EPA ID Number

N J D 0 0 1 2 1 3 7 2 7

II. Name of Installation (Include company and specific site name)

N O V U S F I N E C H E M I C A L S L L C

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

6 1 1 - 6 4 1 B R O A D S T R E E T

Street (Continued)

City or Town

C A R L S T A D T

State

Zip Code

N J 0 7 0 7 2 - 1198

County Code

County Name

B E R G E N

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

4 2 6 O R C H A R D S T R E E T

City or Town

C A R L S T A D T

State

Zip Code

N J 0 7 0 7 2 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

K U L K A R N I

A M O L

Job Title

Phone Number (Area Code and Number)

V I C E - P R E S I D E N T

2 0 1 - 5 0 7 - 4 3 4 3

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

☐
☒

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

N O V U S F I N E C H E M I C A L S L L C

Street, P.O. Box, or Route Number

4 2 6 O R C H A R D S T R E E T

City or Town

State

Zip Code

C A R L S T A D T

N J

0 7 0 7 2 -

Phone Number (Area Code and Number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)

2 0 1 - 5 0 7 - 4 3 2 7

P

P

Yes

X

No

Month

Day

Year

1 2 3 1 9 9

Address Verified US Post Office 58

Notification of Registration
Waste

U.S. EPA
AGENCY R0 II
00 JAN -7 PM 12:44
HAZARDOUS & SOLID WASTE
PROGRAMS BRANCH

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Hazardous Waste Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Boiler and/or Industrial Furnace
☐ 1. Smelter Refractor
☐ 2. Small Quantity Exemption
Indicate Type of Combustion Device(s)
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
☐ a. Utility Boiler
☐ b. Industrial Boiler
☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
☐ a. Transporter
☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Process
☐ b. Re-refine

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable
(D001)☒2. Corrosive
(D002)☒3. Reactive
(D003)☐4. Toxicity
Characteristic☐

(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

☐☐☐☐

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1
F 0 0 2
7

2
F 0 0 3
8

3
F 0 0 5
9

4
10

5
11

6
12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See Instructions.)

1

2

3

4

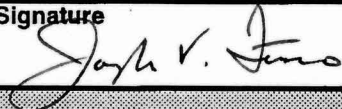
5

6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature



Name and Official Title (Type or print)

Joseph V. Fusco President

Date Signed

12/23/99

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

GANES CHEMICALS

GANES CHEMICALS INC.
630 BROAD STREET
CARLSTADT, NJ 07072
TELEPHONE: (201) 507-4300
TELEFAX: (201) 507-1930

December 23, 1999

CM RR# Z-470-318-005
US EPA Region 2
Air and Waste Management Division
290 Broadway
21st Floor
New York, NY 10007-1866
Attn: RCRA Notifications

Re: EPA ID No. NJD001213727
611-641 Broad Street
Carlstadt, NJ 07072

Dear Sir,

The ownership of the facility referenced above is changing ownership on December 31, 1999 from Ganes Chemicals Inc. to Novus Fine Chemicals L.L.C. Please find enclosed EPA Form 8700-12 "Notification of Regulated Waste Activity" and a copy of New Jersey's Form HWR-001 "Request to Deactivate EPA ID Number".

Please feel free to call me at (201) 507-4333, if you need additional information.

Sincerely,



Roman M. Pazdro
Manager, Environmental Affairs

U.S. EPA
AGENCY RO II
00 JAN -7 PM 12:43
HAZARDOUS & SOLID WASTE
PROGRAMS BRANCH

State of New Jersey
Department of Environmental Protection and Energy
Manifest Section
CN 028, 401 East State Street
Trenton, New Jersey 08625-0028

"Request to Deactivate EPA ID Number"

EPA ID No. NJD001213727

Company Name: Banes Chemicals Inc.

Site Address: 611-641 Broad Street Carlstadt
(street) (city / town)
XXXXXXXXXX New Jersey 07072 10 18,19
(state) (zip code) (lot) (block)

Mailing Address: 630 Broad Street Carlstadt
(street / p.o. box) (city / town)
New Jersey 07072
(state) (zip code)

Company Contact: Roman M. Pazdro (201) 507-4333
(name) (area code and phone number)

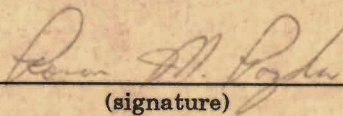
Reasons for deactivating EPA ID No. (Check all appropriate boxes.)

- ☐ The EPA ID number was obtained for a one time cleanup which is completed.
- ☐ The site has completed an ECRA cleanup (indicate ECRA Case # _____).
- ☒ Other Facility ownership is being transferred to Novus Fine Chemicals L.L.C.
on 12/31/99.

Is the site presently occupied? (circle yes or no)

Sign and date the application below, and retain the last page (pink copy) for your records.

Roman M. Pazdro
(printed name)
Manager, Environmental Affairs
(title)


(signature)
12/23/99
(date)

Submission of false information is a violation of N.J.A.C. 7:26-5.6 and N.J.A.C. 7:26-7.3.

copies: White - Manifest Section
Yellow - USEPA Region II
Pink - Applicant

"Request to Deactivate EPA ID Number"

EPA ID No. _____

Company Name _____

Site Address _____

Street _____

Left: town _____

Left: _____

Left: _____

Left: _____

Mailing Address _____

Left: (p.o. box) _____

Left: town _____

Left: _____

Left: _____

Company Contact _____

Left: _____

Left: (area code and phone number) _____

Reason for deactivating EPA ID No. (Check all appropriate boxes)

☐ The EPA ID number was obtained for a one-time cleanup which is completed.

☐ The site has completed an RCRA cleanup under RCRA Case # _____

☐ Other _____

Is the site presently occupied? (circle yes or no)

Sign and date the application below, and retain the last page (pink copy) for your records.

Left: _____

Left: _____

Left: _____

Left: _____

Submission of false information is a violation of N.J.A.C. 7:26-6.6 and N.J.A.C. 7:26-13.

DATE RETURNED _____
REASON _____

☐ ACKNOWLEDGEMENT SENT

INTERNAL CHECKLIST

ID # NJD001213727

complete

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING ☐

(2) FORM 3 MISSING ☐

B. POSTMARK after NOVEMBER 19, 1980 ☐ Valid ☐

C. (1) DATE of OPERATION MISSING ☐

(2) DATE of OPERATION after NOVEMBER 19, 1980 ☐

(i) NON-NOTIFIER ☐
D. (2) NOTIFIED after AUGUST 18, 1980 ☐ Valid ☐

E. (1) FORM 1, VIII B SIGNATURE MISSING ☐

(2) FORM 3, IX B SIGNATURE MISSING ☐

2. { A. HANDLER ☐
B. NONREGULATED ☐
C. UNSURE ☐

D. UNKNOWN FACILITY ☐
(missing name and address on Form 3)

E. NEW FACILITY > NOV. 19, 1980 ☐

F. CORE ITEM(S) MISSING ☐

G. NON-CORE ITEM(S) MISSING ☐

H. OTHER ☐

MISSING :

MAP ☐

DRAWING ☐

PHOTO ☐

AOK

OK

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER	
LABEL ITEMS		NAME: PRESS HARD WHEN FILLING IN NAME & ADDRESS.		F N J D 0 0 1 2 1 3 7 2 7 3 D	
I. EPA I.D. NUMBER		STREET ADDRESS:		GENERAL INSTRUCTIONS	
III. FACILITY NAME		611-641 Broad Street		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
V. FACILITY MAILING ADDRESS		CITY, STATE, & ZIP CODE:			
VI. FACILITY LOCATION		Carlstadt, New Jersey 07072			

II. POLLUTANT CHARACTERISTICS	
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.	
SPECIFIC QUESTIONS	MARK 'X'
	YES NO FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>

III. NAME OF FACILITY	
1	SKIP GANES CHEMICALS INC
IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	
2	JOHN J. VILL PLANT MANAGER
B. PHONE (area code & no.)	
2	2 0 1 4 3 8 3 4 3 3
V. FACILITY MAILING ADDRESS	
A. STREET OR P.O. BOX	
3	611-641 BROAD STREET
B. CITY OR TOWN	
4	CARLSTADT
C. STATE	
4	NJ
D. ZIP CODE	
4	07072
VI. FACILITY LOCATION	
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5	611-641 BROAD STREET
B. COUNTY NAME	
5	BERGEN
C. CITY OR TOWN	
6	CARLSTADT
D. STATE	
6	NJ
E. ZIP CODE	
6	07072
F. COUNTY CODE (if known)	
6	

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	7	2	8	3	3	(specify) MEDICINAL CHEMICALS					C	7	(specify) NA						
15	16	17	18	19						15	16	17	18	19					
C. THIRD										D. FOURTH									
C	7	(specify) NA								C	7	(specify) NA							
15	16	17	18	19						15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																																																		B. Is the name listed in Item VIII-A also the owner?										
C	8 G A N E S C H E M I C A L S I N C																																																		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
15	16																																																	55	66									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																																			D. PHONE (area code & no.)																									
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE																																			C A 2 0 1 4 3 8 3 4 3 3																									
E. STREET OR P.O. BOX																																																												
6 1 1 B R O A D S T																																																												
F. CITY OR TOWN																																			G. STATE					H. ZIP CODE										IX. INDIAN LAND										
B C A R L S T A D T																																			N J					0 7 0 7 2										Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO										
15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52																																			40 41 42					47 48 49 50 51 52										52										

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)																
C	9	N	NA												C	9	P	NA													
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																
C	9	U	NA												C	9	NA (specify)														
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																
C	9	R	NA												C	9	NA (specify)														
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE OF BULK MEDICINAL CHEMICALS.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)																														B. SIGNATURE																				C. DATE SIGNED									
CARL O. ENGELER, Ph.D. Vice-Pres.																																																		11/17/80									

COMMENTS FOR OFFICIAL USE ONLY

C																																																	
15	16																																																

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

NA

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

Application is being filed to maintain compliance in the event that hazardous wastes have to be held longer than 90 days because of problems with normal disposal channels.

FG: $\frac{A}{55}$ FG: $\frac{A}{56}$

EPA I.D. NO. (enter from page 1)

S	F	N	J	D	0	0	1	2	1	3	7	2	7	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	0	5	1	3	6	0
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

0	7	4	0	6	1	0	0
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

- ☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	NA										55	56	57	58	59	60	61	62	63	64	65
15	16																					

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	G										40	41	42	43	44	45	46	47	48	49	50
15	16																					

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Carl O. Engeler, Ph.D. Vice-Pres.

B. SIGNATURE



C. DATE SIGNED

11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)

FOR OFFICIAL USE ONLY

S											T/A	C					
W	DUP										3	2	DUP				
1	2											13	14	15	23	-	26

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

[illegible]

PAGE 3 OF 5

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

CONTINUE ON REVERSE

576

57

21

4524000m N

30 000 FEET
(N. Y.)

4522

4521

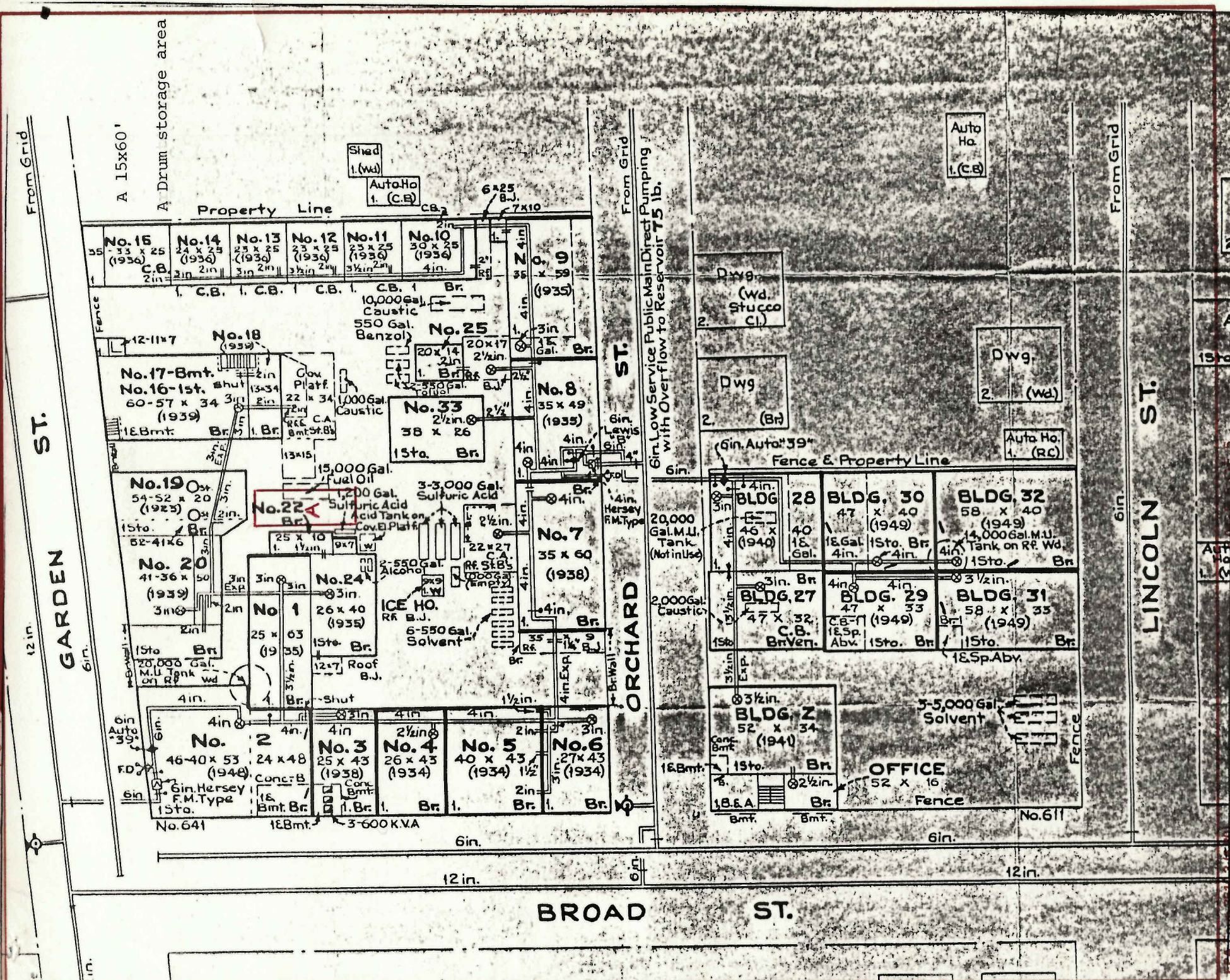
50'

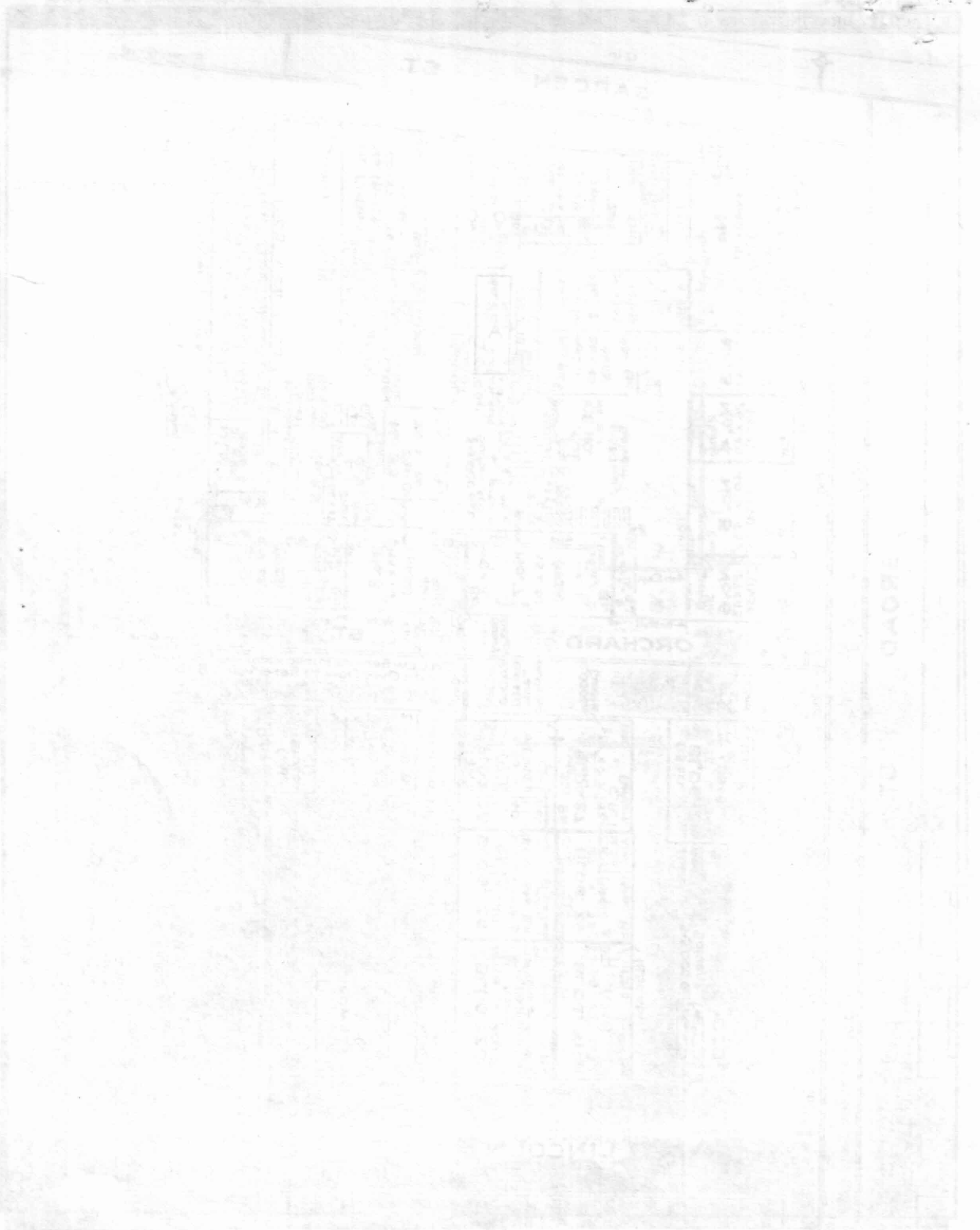
4520

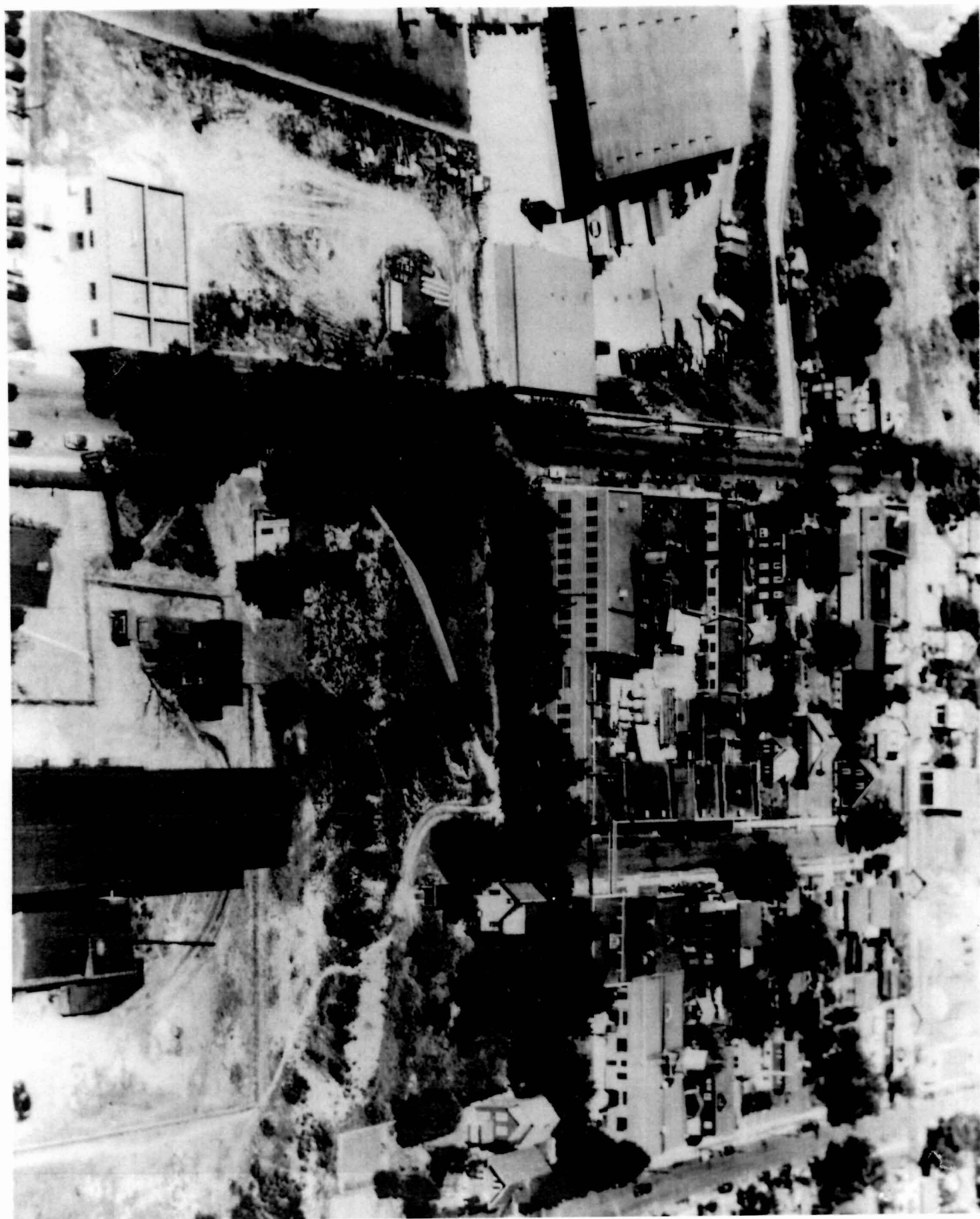
4



Scale 1:24,000







12/08/89

*inspection 8/7/87*WASTE MANIFESTED BY GANES CHEMICAL INC, NJD001213727
1986 - PRESENTGEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: DELAWARE CONTAINER CO. INC.
W 11TH AVE & VALLEY RD
COATESVILLE , PAD001
CHARACTERISTIC OF IGNITABILITYMAN: PAR2615464
AMT: 5300 G
SHIPPED: 5/01/87 ← IGEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: DELAWARE CONTAINER CO. INC.
W 11TH AVE & VALLEY RD
COATESVILLE , PAF003
NON HAL SOLV & STLBTMMAN: PAR2616832
AMT: 5000 G
SHIPPED: 3/22/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: DELAWARE CONTAINER CO. INC.
W 11TH AVE & VALLEY RD
COATESVILLE , PAF003
NON HAL SOLV & STLBTMMAN: PAR4825715
AMT: 5495 G
SHIPPED: 5/03/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: DELAWARE CONTAINER CO. INC.
W 11TH AVE & VALLEY RD
COATESVILLE , PAF003
NON HAL SOLV & STLBTMMAN: PAR4825726
AMT: 5300 G
SHIPPED: 5/27/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: DELAWARE CONTAINER CO. INC.
W 11TH AVE & VALLEY RD
COATESVILLE , PAF003
NON HAL SOLV & STLBTMMAN: PAR2616821
AMT: 5041 G
SHIPPED: 6/27/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: DELAWARE CONTAINER CO. INC.
W 11TH AVE & VALLEY RD
COATESVILLE , PAF003
NON HAL SOLV & STLBTMMAN: PAR4825730
AMT: 4500 G
SHIPPED: 7/20/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: DELAWARE CONTAINER CO. INC.
W 11TH AVE & VALLEY RD
COATESVILLE , PAF003
NON HAL SOLV & STLBTMMAN: PAR4825753
AMT: 5100 G
SHIPPED: 10/28/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: S & W WASTE INC.
105 JACOBUS AVE
S KEARNY , NJF003
NON HAL SOLV & STLBTMMAN: NJA0371748
AMT: 4800 G
SHIPPED: 12/04/87GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: S & W WASTE INC.
105 JACOBUS AVE
S KEARNY , NJF003
NON HAL SOLV & STLBTMMAN: NJA0371746
AMT: 4650 G
SHIPPED: 1/05/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: S & W WASTE INC.
105 JACOBUS AVE
S KEARNY , NJF003
NON HAL SOLV & STLBTMMAN: NJA0371746
AMT: 1850 G
SHIPPED: 1/05/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: S & W WASTE INC.
105 JACOBUS AVE
S KEARNY , NJF005
NONHL SOLV & STLBTMMAN: NJA0371747
AMT: 5350 G
SHIPPED: 2/05/88GEN: GANES CHEMICAL INC
611-641 BROAD ST
CARLSTADT , NJTSD: S & W WASTE INC.
105 JACOBUS AVE
S KEARNY , NJF005
NONHL SOLV & STLBTMMAN: NJA0371749
AMT: 5300 G
SHIPPED: 3/02/88

12/08/89

WASTE MANIFESTED BY GANES CHEMICAL INC, NJD001213727
1986 - PRESENT

GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: S E W WASTE INC. 105 JACOBUS AVE S KEARNY , NJ	F005 NONHL SOLV & STLBTM	MAN: NJA0414698 AMT: 5270 G SHIPPED: 4/13/88

GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	F005 NONHL SOLV & STLBTM ?	MAN: NJA0159768 AMT: 4794 G SHIPPED: 1/08/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D002 CHARACTERISTIC OF CORROSTIVITY	MAN: NJA0159769 AMT: 1400 P SHIPPED: 1/27/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D001 CHARACTERISTIC OF IGNITABILITY	MAN: NJA0159769 AMT: 10200 P SHIPPED: 1/27/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D001 CHARACTERISTIC OF IGNITABILITY	MAN: NJA0159769 AMT: 4550 P SHIPPED: 1/27/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D001 CHARACTERISTIC OF IGNITABILITY	MAN: NJA0159770 AMT: 4420 G SHIPPED: 2/07/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D001 CHARACTERISTIC OF IGNITABILITY	MAN: NJA0159771 AMT: 5000 G SHIPPED: 4/14/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D001 CHARACTERISTIC OF IGNITABILITY	MAN: NJA0159772 AMT: 5175 G SHIPPED: 5/30/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D001 CHARACTERISTIC OF IGNITABILITY	MAN: NJA0159773 AMT: 2400 P SHIPPED: 6/20/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	X910 CHEMICAL PROCESS-SOLID,NDS	MAN: NJA0159773 AMT: 1950 P SHIPPED: 6/20/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D002 CHARACTERISTIC OF CORROSTIVITY	MAN: NJA0159773 AMT: 650 P SHIPPED: 6/20/86
GEN: GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	TSD: SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	D001 CHARACTERISTIC OF IGNITABILITY	MAN: NJA0159774 AMT: 4486 G SHIPPED: 6/24/86

12/08/89

WASTE MANIFESTED BY GANES CHEMICAL INC, NJD001213727
1986 - PRESENT

GEN:	TSD:	DO01	MAN:
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0159775 4794 G 7/24/86
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0159775 5000 G 10/15/86
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0159778 5761 G 12/12/86
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0166798 6132 G 3/30/87
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0159781 5501 G 6/08/87
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0159782 6012 G 7/21/87 ← I
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0320161 5340 G 9/04/87
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0371741 5400 P 9/15/87
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0371741 5250 P 9/15/87
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0371742 5000 G 9/30/87
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0371743 5501 G 10/22/87
GANES CHEMICAL INC 611-641 BROAD ST CARLSTADT , NJ	SOLVENTS RECOVERY SERV OF NJ 1200 SYLVAN STREET LINDEN , NJ	CHARACTERISTIC OF IGNITABILITY	NJA0371745 4964 G 11/06/87

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input checked="" type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)													
		(Record of item checked above)													
TO: <div style="font-size: 1.5em; font-family: cursive;">File</div>	FROM: <div style="font-size: 1.5em; font-family: cursive;">Jim Sullivan</div>	DATE <div style="font-size: 1.5em; font-family: cursive;">12/5/89</div>	TIME												
SUBJECT <div style="font-size: 1.5em; font-family: cursive;">Ganes Chemical</div>															
SUMMARY OF COMMUNICATION <div style="font-size: 1.2em; font-family: cursive; padding: 10px;"> <p>On 12/4/89 I visited Ganes Chemicals (NJDO01213727) in order to determine compliance with a CA/CO reached with the company on 6/5/89 (see Docket No. II RCRA-88-0121). The violations in question were 40 C.F.R. 268.7(a)(1) and N.J.A.C. 7:26-7.4(a)(4)(vii). The following manifests were reviewed:</p> <table style="margin-left: auto; margin-right: auto; border: none;"> <tr> <td style="padding: 5px;">NJAO658953</td> <td style="padding: 5px;">7/11/89</td> <td style="padding: 5px;">All shipped via</td> </tr> <tr> <td style="padding: 5px;">NJAO658954</td> <td style="padding: 5px;">9/7/89</td> <td style="padding: 5px;">tank truck to</td> </tr> <tr> <td style="padding: 5px;">NJAO658955</td> <td style="padding: 5px;">10/12/89</td> <td style="padding: 5px;">Marisol, Middlesex, NJ.</td> </tr> <tr> <td style="padding: 5px;">NJAO658956</td> <td style="padding: 5px;">11/15/89</td> <td></td> </tr> </table> <p>The LR notifications attached to these manifests</p> </div>				NJAO658953	7/11/89	All shipped via	NJAO658954	9/7/89	tank truck to	NJAO658955	10/12/89	Marisol, Middlesex, NJ.	NJAO658956	11/15/89	
NJAO658953	7/11/89	All shipped via													
NJAO658954	9/7/89	tank truck to													
NJAO658955	10/12/89	Marisol, Middlesex, NJ.													
NJAO658956	11/15/89														
CONCLUSIONS, ACTION TAKEN OR REQUIRED <div style="font-size: 1.2em; font-family: cursive; padding: 10px;"> <p>did not have the EPA hazardous waste number listed. I feel that this is not a problem because there is only one waste stream listed in item 11. The spent solvents are shipped exclusively to Marisol.</p> </div>															
INFORMATION COPIES TO:															

Form with fields and checkboxes, including a "PHONE CALL" checkbox and a "RECEIVED" stamp.

PHONE CALL	<input type="checkbox"/>
RECEIVED	

Main body of the document containing faint, illegible text and a horizontal line.

SUMMARY OF FINDINGS

Graves Chemical

FACILITY DESCRIPTION AND OPERATIONS:

Next, I asked the facility representative to show me Graves' hazardous waste storage area. The drum storage area was located in the plant's quadrangle and was presently storing 30 to 40 drums. The drums were arranged in manner such that no aisle space was provided, so labels in the middle of this grouping could not be seen. I checked the drums along the perimeter and they were labeled and in good condition.

Before I left I informed facility rep. Mr. William Melofchuk of the problems in the hazardous waste storage area, he assured me that the improper storage was contrary to his instructions.

SUBJECT OF FINDINGS

J-L H1 Lise

Chemical Conservation

3/16/89

NJA 0658931/Georgia

5/8/89

NSA0550032

SK
AT
EE
TGN

MEK

MIBK

Recovery

TANKS

No T.S. refers to 268.32
only two manifest in 1989 file
RV not present
Check the ADDER

GRAVES

NSA0658953

7/11/89

No EPA Waste

NJA 0658954

9/7/89

" " "

NSA 0658955

10/12/89

" " "

NJA 0658956

11/15/89

All shipments only 1 item in box 11a
FOOS constituents acetone Ethyl acetate
Ethyl ether, Methanol, MEK, MIBK Toluene

shipped via 11 to Marisol, Middlesex, NJ



INSPECTION REPORT

REPORT PREPARED FOR:

☒ Generator Foo5.

☐ Transporter

☐ HWM (TSD) Facility

☒ Landfill

FACILITY INFORMATION

Name: GANES CHEMICAL Inc.

Address: 611 BROAD STR
CARLSTADT, NJ 07072

Lot: _____ Block: _____

County: BERGEN

Phone: 201-438-3433

EPA ID #: NJD001213727

Date of Inspection: Aug. 07. 87

PARTICIPATING PERSONNEL

State or EPA Personnel: BOLESŁAW CZACHOR - NJ-DEP

Facility Personnel: WILLIAM MELOFCHIK
REG AFF. MGR.

Report Prepared by Name: BOLESŁAW CZACHOR

Region: 14

Telephone #: 201 669-3960

Reviewed by: Yael Sm. L. Yael

Date of Review: 09-02-87

INSPECTION REPORT



FACILITY NAME: GANES CHEMICAL Inc.

ADDRESS: 611 BROAD ST

CARLSTADT, N.J. 07072

TIME IN: 1430

COUNTY: BERGEN

TIME OUT: 1600

EPA ID : NJ 001213727

DATE OF INSPECTION: 08/07/87

PHOTOS TAKEN

☐ YES

☒ NO

If yes, how many? N/A

SAMPLE TAKEN

☐ YES

☒ NO

NO. OF SAMPLES N/A

NJDEP ID # N/A

MANIFESTS REVIEWED

☒ YES

☐ NO

Number of manifests in compliance 1

Number of manifests not in compliance 8

List manifest document numbers of those manifests not in compliance.

should be

m# NJA 0159782 (07/21/87) - D001 - Fe05 ✓

m# NJA 0159781 (06/08/87) - D001 - Fe05 ✓

m# FAB 2625464 (05/01/87) - D201 - Fe05 ✓

m# NJA 0166798 (03/30/87) - D001 - Fe05 ✓

m# NJA 0159780 (02/20/87) - D001 - Fe05

m# NJA 0166799 (01/19/87) - D001 - Fe05

m# NJA 0159778 (12/12/86) - D001 - Fe05 ✓

m# NJA 0159777 (11/19/86) - D001 - Fe05.



6-11-52 CHEMICALS FACILITY NAME

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

The GANES Chemical Inc. located at 611 BROAD STR in CARLSTADT, N.J. with the EPA assigned number NJD 001203727 is a manufacturer of bulk medicinal chemicals, with the STANDARD INDUSTRIAL CODE 2833.

ALL kind of chemical processes are involved in the manufacturing operation, and the hazardous wastes are generated at the entire plant operations.

HAZ. Waste Management.

ALL hwr. wastes which are mostly liquids are collected and accumulated into the 55 GAZ drums. No tanks, either aboveground or underground are used for storage of hwr. waste. ~~Then the waste is pumped.~~ When the truck load is accumulated, the waste is pumped out from the drums into the tank trailer and shipped off site, within 90 days storage time limit.

The SRS from Linden, N.J. is utilized as disposal site of most of the hwr. wastes generated on site.

This inspection revealed that the company is in substantial compliance

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SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

with the N.J. Haz. Waste Regulations, on both, the documentation and the haz. waste storage area.

No field NOV's were issued to the company, but in my opinion the company is knowingly misclassifying the waste on the haz. waste manifest. The waste is classified as D001 - Flamm. Waste, instead of 005 as per Land Ban Restrictions reg. which went in effect on Nov. 08. 86. Therefore the case should be referred to the federal US EPA for further action on it.

Describe the activities that result in the generation of hazardous waste.

- manufacturing process of medicinal chemicals.

Identify the hazardous waste located on site, and estimate the approximate quantities of each.
(Identify Waste Codes)

→ 52-55 GAL steel drums of FLAMMABLE WASTE, accord to facility operator it is D001,

GENERATOR INSPECTION CHECKLIST

		YES	NO	N/A
7:26-8.5	<u>Hazardous waste determination</u>			
	(a) Did the generator test its waste to determine whether it is hazardous?	—	X	—
	Is the waste hazardous?	X	—	—
7:26-8.5(b)2	Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	X	—	—
	Has hazardous waste been shipped off site since November 19, 1980?	X	—	—
	If yes, how many shipments, off site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.			
	one shipment a month avg. 5000 GAL / T/T.			
7:26-7.4(a)1	Does the generator have an EPA ID #?	✓	—	—
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient)	✓	—	—
7:26-7.4(a)4i	The generator's name, address and phone number?	✓	—	—
7:26-7.4(a)4ii	The generator's EPA ID number?	✓	—	—
7:26-7.4(a)4iii	The transporter(s) name, address and phone number?	✓	—	—
7:26-7.4(a)4iv	The transporter(s) EPA ID number?	✓	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility?	✓	—	—
7:26-7.4(a)4vi	The TSDF's EPA ID number?	✓	—	—
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓	—	—
	"My Oversight" From B.C.			

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by the generator?	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:			
7:26-7.4(a)5i	Sign the manifest certification by hand?	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.4(a)5iv	Give remaining copies of the manifest form to the transporter?	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.4(f)1	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.4(h)2	If not:			
	1. Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at 609-292-9877 to inform the NJDEP of the situation, and	<u>—</u>	<u>—</u>	<u>✓</u>
	2. Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	<u>—</u>	<u>—</u>	<u>✓</u>
	Before transporting or offering hazardous waste for transportation off site, does the generator?			
7:26-7.2(a)	Conspicuously label appropriate manifest numbers on all hazardous waste containers that are intended for shipment?	<u>✓</u>	<u>—</u>	<u>—</u>
7:26-7.2(b)	Insure that all containers used to transport hazardous waste off site, are in conformance with applicable DOT regulations (i.e., 49 CFR 171 - 49 CFR 179)?	<u>✓</u>	<u>—</u>	<u>—</u>

YES NO N/A

7:26-9.3

Accumulation time

How is waste accumulated on site?

- ☒ Containers
- ☐ Tanks (complete HWMF checklist)
 - ☐ Aboveground ☐ Below ground
- ☐ Surface impoundments (complete HWMF checklist)
- ☐ Piles (complete HWMF checklist)

7:26-9.3(a)3

Is each container clearly dated with each period of accumulation so as to be visible for inspection?

X — —

7:26-9.3(a)1

Is waste accumulated for more than 90 days?

— X —

If yes, complete HWMF checklist.

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSD) CHECKLIST IS FILLED OUT.

SHORT TERM ACCUMULATION STANDARDS (FOR GENERATORS WHO ACCUMULATE WASTE IN CONTAINERS FOR 90 DAYS OR LESS)

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.4	<u>Containers</u>			
	What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty five gallon drums of waste acetone).			
	52 - 55 GAL steel drums, accord. to the facility operator Dept. Flammable Waste.			
7:26-9.4(d)1i	Do the containers appear to be in good condition, not in danger of leaking?	X	—	—
	If no, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)4i	Are all containers securely closed except those in use?	X	—	—
7:26-9.4(d)4iii	Do containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	X	—	—
7:26-9.4(d)4iv	Are containerized hazardous waste segregated in storage by waste type?	X	—	—
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	X	—	—
7:26-9.4(d)5	Is the storage area inspected at least daily?	X	—	—
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 feet (15 meters) from the facility's property line?	X	—	—
7:26-11.2	<u>Tanks</u>			
7:26-12.1(a)	Does the generator store hazardous waste in tanks?	—	—	—
	If yes, what are the approximate number and size of tanks containing hazardous waste?			3

Identify the waste treated/stored in each tank.

YES NO N/A

General Operating Requirements

7:26-11.2(a)2 Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

If no, please explain.

Are there leaking tanks?

7:26-11.2(a)2 Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures?

7:26-11.2(3) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

7:26-11.2(a)4 If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?

7:26-11.2(d) Inspections

Is the tank(s) inspected each operating day for:

1. Discharge control equipment
2. Monitoring equipment
3. Level of waste in tank
4. Construction of materials of the tank
5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

7:26-9.2(b) Are there underground tanks used to store hazardous waste?

If yes, how many and can they be entered for inspection?

7:26-11.2(e) Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

If no, please explain.

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-11.2(f)	Does it appear that incompatible wastes are being stored separate from each other?	<u>X</u>	—	—
7:26-9.4(g)4	<u>Personnel training</u> Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	<u>X</u>	—	—
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?	<u>X</u>	—	—
7:26-9.4(g)5	If yes, have facility personnel taken part in an annual review of the initial training? Is there written documentation of the following:	<u>X</u>	—	—
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	<u>X</u>	—	—
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	<u>X</u>	—	—
7:26-9.4(g)6iii	A written description of the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?	<u>X</u>	—	—
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	<u>X</u>	—	—
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	<u>X</u>	—	—
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?	<u>X</u>	—	—

YES

NO

N/A

7:26-9.6

Preparedness and prevention

Does the facility comply with preparedness
and prevention requirements including
maintaining:

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.6(b)1	An internal communications or alarm system?	<u>X</u>	—	—
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	<u>X</u>	—	—
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	<u>X</u>	—	—
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	<u>X</u>	—	—
7:26-9.6(c)	Is equipment tested and maintained?	<u>X</u>	—	—
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	<u>X</u>	—	—
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	<u>X</u>	—	—

If no, please explain.

In your opinion, do the types of waste on site require all of the above procedures, or are some not required?

X — —

Explain.

7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site:	<u>X</u>	—	—
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	<u>X</u>	—	—
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	—	—	<u>X</u>

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?	<u>X</u>	—	—
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	<u>X</u>	—	—
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	<u>X</u>	—	—
7:26-9.7	<u>Contingency plan and emergency procedures</u>			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	<u>X</u>	—	—
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	<u>X</u>	—	—
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	<u>X</u>	—	—
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 <u>et seq.</u> ?	—	—	<u>X</u>
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	—	—	<u>X</u>
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	<u>X</u>	NO	—

YES NO N/A

7:26-9.7(f)

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.

X ~~NO~~ —

7:26-9.7(g)

Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?

X ~~NO~~ —

7:26-9.7(h)

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?

X — —

7:26-9.7(i)

Is a copy of the contingency plan and all revisions to the plan:

1. Maintained at the facility; and

X — —

2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?

X ~~NO~~ —

GENERATOR PRE-INSPECTION REVIEW

1. Did the generator notify the Agency that it was generating an F-solvent waste on Form 8700-12 (Request for I.D. Number) [262.12]? *NO*
2. Has the generator achieved interim or permitted status as a storage facility by filing a Part A, Part B, or via an interim status compliance letter (ISCL)? *NO*
3. Is the generator a pharmaceutical plant? *YES*
4. Have all the generator's F-solvent wastes been delisted by the Agency? *NO*
5. Has the generator been granted a case-by-case extension by the Administrator [268.5]? And, if so, is that extension still in effect? If the extension is in effect, has the generator been providing progress reports on time? *NO*
6. Is the generator a Small Quantity Generator (100-1,000 Kg/month) of F-solvents [268.30]? (Determine whether the national capacity extension applies.) *NO*
7. Is the F-solvent waste generated by a RCRA Corrective Action or a CERCLA response? If so, is the waste considered soil or debris [268.30]? *NO*
8. Is the F-solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil containing less than one percent total F001-F005 constituents by weight [268.30]? (Determine whether national capacity extension applies.) *N/A*
9. Is the F-solvent waste a wastewater (a solvent-water mixture containing total organic carbon of one percent or less) [268.30]? (Determine appropriate BDAT level.) *NO*
10. Has the facility at which the generator's waste is disposed been granted a variance from treatment standards per [268.44] (i.e., did the final decision appear in the Federal Register)? *NO*
11. Has the facility at which the generator's waste is disposed received a "no migration" waiver [268.6] or a case-by-case extension [268.5]? *NO*

Inspector: P. CZACHOR
 Address: 2 BARBOCK PL
W. ORANGE, N.J. 07072
 Telephone No: 201-664-3960

DRAFT
 RCRA LAND RESTRICTION F-SOLVENT
 GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

GANES CHEMICAL Inc. 611 BROAD STR.
 A. Handler Name B. Street (or other identifier)
CARLESTADT, N.J. 07072 BERGEN
 C. City D. State E. Zip Code F. County Name
manufacturer of bulk medicinal chemicals
 G. Nature of Business; Identification of Operations
NJD 001213727
 H. EPA ID#
WILLIAM MELOFEHIK - MGR.
 I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b. F002	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c. F003	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☐ No

d. F004	<input type="checkbox"/> Yes	<input type="checkbox"/> No
e. F005	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

2. Source of the above: Form 8700-12 ☐; Part A ☐; Part B ☐;
 other (specify) ☐

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: _____

Handler Name: BANES CHEM
 ID Number: _____
 Inspector: B. E.
 Date: 8/07/87

B. BDAT Treatability Group - Treatment Standards Identification

Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

___ Yes ☒ No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ☒ Yes ___ No

b. TCLP ___ Yes ___ No

c. Other (specify) _____

If knowledge, note how this is adequate: _____

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note any problems: _____

- d. Were wastes tested using TCLP when a process or wastestream changed?

___ Yes ___ No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

___ Yes ___ No
 ___ Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]

___ Yes ☒ No

D. Management

1. Onsite management

- a. Were F-solvent wastes managed onsite?

___ Yes ☒ No

If yes, answer 1(b) and (c); if no, answer 2.

GEN-3

Handler Name: GANES CHEM
ID Number: _____
Inspector: B.C.
Date: 8/07/87

Comments

- c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

___ Yes ___ No

E.. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?

___ Yes ☒ No

If yes, was facility operating as a TSD under interim status or final permit? ___ Yes ___ No

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

___ Yes ☒ No

If yes, list type of treatment unit and processes

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

Handler Name: CANES CHEM
ID Number: _____
Inspector: Be.
Date: 08/07/87

APPENDIX A

Comments

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☐ No

Handwritten notes:
Haven't used for years
Reused in 82-83
Catalyst 82-83, Product discarded

Handler Name: GANES CHEM

ID Number: _____

Inspector: B. C.Date: 08/07/87Comments

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

☐ Yes ☐ No
☐ Yes ☐ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

☐ Yes ☐ No
☐ Yes ☐ No
☐ Yes ☐ No
☐ Yes ☐ No
☐ Yes ☐ No

*- contributes to methyl
as reactant*

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

☒ Yes ☐ No

If the answer is yes, list the constituents.

(b) ~~Degreasing~~/cleaning?

☐ Yes ☐ No

If the answer is yes, list the constituents.

(c) Diluents?

☒ Yes ☐ No

If the answer is yes, list the constituents.

Handler Name: CANES CUMEN
ID Number: _____
Inspector: B.C.
Date: 08/07/87

(d) Extractants?

☒ Yes ☐ No

Comments

If the answer is yes, list the constituents.

(e) Fabric scouring?

☐ Yes ☒ No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media?

☒ Yes ☐ No

If the answer is yes, list the constituents.

If questions 1-6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed. ☒ Yes ☐ No

8. If the waste is a mixture of constituents as determined in questions 1-7, answer this to determine whether it is a "solvent mixture" covered by the listings.

If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5% methylene chloride
2% trichloroethylene
25% 1,1,1-trichloroethane
68% mineral spirits
100%

If the wastestream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

Handler Name: CANES CHEM
ID Number: _____
Inspector: B.C.
Date: 08/07/87

Comments

With respect to the F003 solvent wastes, if, before use, the wastestream is mixed and contains only F003 constituents, it is a listed waste. For example:

33% acetone
16% methanol
51% ethyl ether
100%

If the wastestream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste.

For example:

50% xylene F003
12% TCE F001
38% mineral spirits
100%

If in light of the above, the handler appears to be generating F001-f005 hazardous wastes, refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

~ 50% Toluene
~ 50% water
Alcohol
~ 10-15% mineral
MIBK

**Division of Waste Management
CN 028, Trenton, NJ 08625**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

N J 0 0 0 1 2 1 3 7 2 7

Manifest Document No.

2. Page 1
of

Information in the shaded areas
is not required by Federal law.*

3. Generator's Name and Mailing Address:
GOLD CHEMICAL, INC.
611 BROAD STREET
CARLSTADT, NJ 07072

4. Generator's Phone (201) 438-3433

5. Transporter 1 Company Name
CONTINENTAL CARRIERS

6. US EPA ID Number

2 1 0 9 9 0 7 2 8 6 5 8

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address:
SOLVENT RECOVERY SERVICE OF NEW JERSEY INC.
1200 SYLVAN STREET, LINDEN, NJ 07036

10. US EPA ID Number

N J 0 0 0 2 1 1 2 8 5 7

A. State Manifest
Document Number

NJA0159782

B. State Gen. ID

SAME

C. State Transporter 1 ID

NJDEPS5771

D. Transporter's Phone

(201) 727-1188

E. State Transporter 2 ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone (201) 862-2000

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total Quantity

14. Unit
Wt/Vol

15. Waste No.

a. AROMATIC FLUORINE LIQUID WASTE
PHARMACEUTICAL BYPRODUCTS IN
TOLUENE, ALCOHOLS & WATER

UN1993

900 = 2

06012 G

0001

GENERATOR

J. Additional Descriptions for Materials Listed Above

TOLUENE 30%, ALCOHOLS 40%, METHYL ISOBUTYL KETONE 15%, SOLIDS 10%, WATER 5%.

K. Handling codes for Wastes Listed Above

PIN NO: 001851-FB.

15. Special Handling Instructions and Additional Information

AVOID EXPOSURE TO FUMES.
AVOID RESPIRATOR LIQUID WITH SKIN AND EYES.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name

William J. Weisschick

Signature

William J. Weisschick

Date

Month Day Year
0 7 2 1 8 7

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Robert D. Duggan

Signature

Robert D. Duggan

Date

Month Day Year
0 7 2 1 8 7

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

NJA0159782

**Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625**

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Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D001213727		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.*					
3. Generator's Name and Mailing Address GANES CHEMICALS, INC. 611 BROAD STREET CARLSTADT, NJ 07072						A. State Manifest Document Number NJA0159781							
						B. State Gen. ID SAME							
4. Generator's Phone (201) 438-3433						C. State Transporter 1-ID NJDEPS5771							
5. Transporter 1 Company Name CONTINENTAL CARRIER						6. US EPA ID Number NJ D990729658							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address SOLVENT RECOVERY SERVICE OF NEW JERSEY INC. 1200 SYLVAN STREET, LINDEN, NJ 07036						10. US EPA ID Number NJ D002182897							
						D. Transporter's Phone (201) 727-1138							
						E. State Transporter 2-ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone (201) 862-2000							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit W/Vol		15. Waste No.	
						No. Type							
a. WASTE FLAMMABLE LIQUID N.O.S. PHARMACEUTICAL BY-PRODUCTS IN TOLUENE, ALCOHOLS & MIBK FLAMMABLE/LEQUID UN1993						001		550		G		D001	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling codes for Wastes Listed Above							
TOLUENE 30%, ALCOHOLS 40%, METHYL ISOBUTYL KETONE 15%, SOLIDS 10%, WATER 1%													
PIN NO.: 001851-FB													
15. Special Handling Instructions and Additional Information													
<p align="center">AVOID EXPOSURE TO FUMES.</p> <p align="center">AVOID CONTACT OF LIQUID WITH SKIN AND EYES.</p>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name W.J. MELOFCHIK				Signature <i>W.J. Melofchik</i>		Date 06/08/87							
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Bob Dwinster				Signature <i>Bob Dwinster</i>		Date 06/08/87							
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name				Signature		Date							
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name				Signature		Date							

NJ A0159781



Harrisburg, PA 17120

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ER-SWM-51:REV. 10/84

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. B. J. D. 00.1.2.1.3.7.2.7		Manifest Document No. 7.4.1.1.1		2. Page 1 1 of 1		Information in the shaded areas is not required by Federal law but is required by State law.				
3. Generator's Name and Mailing Address GAMES CHEMICALS, INC. 611-641 BROAD STREET CARLSTADT, NJ 07072					A. State Manifest Document Number PAB 2625464							
					B. State Gen. ID PA-AH							
4. Generator's Phone (201) 432-3433					C. State Trans. ID PA-AH 00032							
5. Transporter 1 Company Name DELAWARE CONTAINER CO.			6. US EPA ID Number P.A. D.O. 6.4.3.7.5.4.7.0		D. Transporter's Phone (219) 383-6600							
7. Transporter 2 Company Name			8. US EPA ID Number		E. State Trans. ID PA-AH							
9. Designated Facility Name and Site Address DELAWARE CONTAINER CO. W. 11TH AVE. & VALLEY ROAD COATSVILLE, PA 19320			10. US EPA ID Number P.A. D.O. 6.4.3.7.5.4.7.0		F. Transporter's Phone ()							
					G. State Facility's ID Not Required							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. WASTE FLAMMABLE LIQUID N.O.S. PHARMACEUTICAL BY-PRODUCTS IN TOLUOL, ALCOHOLS & KINK FLAMMABLE/LIQUID 1993, HAZ. CODE 1, REF 9343.					12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
					No. Type		Quantity		Wt/Vol		Waste No.	
b.					1		5.30.0		G		00001	
c.												
d.												
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code) Haz. Code Physical State					K. Handling Codes for Wastes Listed Above Number and ID Number							
a. 1					a. 1							
b. 1					b. 1							
c. 1					c. 1							
d. 1					d. 1							
15. Special Handling Instructions and Additional Information If I am a large quantity generator, I certify that I have a process in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Form Approved OMB No. 2000-0039 9/30/88 8/30/92 9/86												
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws/regulations.												
Printed/Typed Name W. J. MELOFCHIK					Signature [Signature]					Date Month Day Year 05 01 87		
17. Transporter 1 Acknowledgement of Receipt of Materials												
Printed/Typed Name [Signature]					Signature [Signature]					Date Month Day Year 05 01 87		
18. Transporter 2 Acknowledgement of Receipt of Materials												
Printed/Typed Name					Signature					Date Month Day Year		
19. Discrepancy Indication Space												
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.												
Printed/Typed Name					Signature					Date Month Day Year		

PAB 2625464

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

NAME	LAST, FIRST, MIDDLE	DATE OF BIRTH	SEX	RACE	EDUCATION	RELIGION	POLITICAL AFFILIATION	EMPLOYMENT	RESIDENCE	TELEPHONE	MAILING ADDRESS

WASTE MANAGEMENT
3000 N. 10TH AVE.
SUITE 100
DENVER, CO 80202
(303) 733-1111

Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ00001213717		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.*					
3. Generator's Name and Mailing Address CANES CHEMICALS, INC. 611 BROAD STREET, CARLSTADT, NJ 07072						A. State Manifest Document Number NJA0166798							
4. Generator's Phone (201) 436-3430						B. State Gen. ID SAME							
5. Transporter 1 Company Name CONTINENTAL CARRIERS				6. US EPA ID Number NJ00000729056		C. State Transporter 1 ID NJDEPS5771							
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone (201) 727-1188							
9. Designated Facility Name and Site Address SOLVENT RECOVERY SERVICE OF NEW JERSEY INC. 1200 SYLVAN ST., LINDEN NJ 07036						E. State Transporter 2 ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone (201) 362-2000							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. HAZARDOUS FLAMMABLE LIQUID N.O.S. FLAMMABLE/LIQUID PHARMACEUTICAL BY-PRODUCTS IN TOLUENE, ALCOHOLS & WATER. UN1993						401 TI						D001	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above TOLUENE 30%, ALCOHOLS 40%, METHYL ISOBUTYL KETONE 15%, SOLIDS 10%, WATER 5%. PIN NO: 001851-FB.						K. Handling codes for Wastes Listed Above							
a.						a.							
b.						b.							
c.						c.							
d.						d.							
15. Special Handling Instructions and Additional Information AVOID EXPOSURE TO FUMES. AVOID CONTACT OF LIQUID WITH SKIN AND EYES.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name WILLIAM J. KLOPFCHIK						Signature <i>William J. Klopchik</i>						Date 08/30/87	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <i>Paul Klopchik</i>						Signature <i>Paul Klopchik</i>						Date 08/30/87	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature						Date	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature						Date	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D 0 0 9 1 2 1 2 7 2 7		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.*	
3. Generator's Name and Mailing Address GARES CHEMICALS, INC. 611 BROAD STREET, CARLSTADT, NJ 07072				A. State Manifest Document Number NJA0159780			
4. Generator's Phone (201) 438-3433				B. State Gen. ID SAME			
5. Transporter 1 Company Name CONTINENTAL CARRIERS		6. US EPA ID Number NJ D 9 9 0 7 2 9 6 5 3		C. State Transporter 1 ID NJDEPS5771		D. Transporter's Phone (201) 727-1183	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter 2 ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address SOLVENT RECOVERY SERVICE OF NEW JERSEY INC. 1200 SYLMAN STREET, LINDEN, NJ 07036				10. US EPA ID Number NJ D 0 0 2 1 8 2 8 9 7		G. State Facility's ID	
				H. Facility's Phone (201) 862-2000			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
a. WASTE FLAMMABLE LIQUID N.O.S. FLAMMABLE/LIQUID PHARMACEUTICAL BY-PRODUCTS IN UN1993 TOLUENE, ALCOHOLS, & KIBK.				No. Type		14. Unit W/Vol	
				0 0 1 T I		0 5 0 9 8 G	
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above Toluene 30%, Alcohols 40%, Methyl Isobutyl Ketone 15%, Solids 10%, Water 5%. PIN NO: 001851-FB				K. Handling codes for Wastes Listed Above			
a.				b.			
b.				c.			
c.				d.			
15. Special Handling Instructions and Additional Information AVOID EXPOSURE TO FUMES. AVOID CONTACT OF LIQUID WITH SKIN AND EYES.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.							
Printed/Typed Name WILLIAM J. MELOFCHIK				Signature <i>William J. Melofchik</i>		Date Month Day Year 0 2 2 0 8 7	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name JOHN RUSCOE				Signature <i>John Ruscoe</i>		Date Month Day Year 0 2 2 0 8 7	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Date Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Date Month Day Year	

NJ A0159780

**Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ 0000012117		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.*					
3. Generator's Name and Mailing Address JAMES CHEMICALS, INC., 611 BROAD STREET, CARLSTADT, NJ 08071						A. State Manifest Document Number NJA0166799							
						B. State Gen. ID SAME							
4. Generator's Phone (201) 438-3433						C. State Transporter 1 ID NJDEPSS771							
5. Transporter 1 Company Name CONTINENTAL CARRIER			6. US EPA ID Number NJ 0000012117			D. Transporter's Phone (201) 727-1138							
7. Transporter 2 Company Name			8. US EPA ID Number			E. State Transporter 2 ID							
9. Designated Facility Name and Site Address SOLVENT RECOVERY SERVICE OF NEW JERSEY INC. 1200 SYLVAN ST., LINDEN, NJ 07036						F. Transporter's Phone							
						G. State Facility's ID							
10. US EPA ID Number NJ 0000012117						H. Facility's Phone (201) 962-2000							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. WASTE FLAMMABLE LIQUID N.O.S. PHARMACEUTICAL BY-PRODUCTS IN TOLUENE, ALCOHOLS & MIX. b. c. d.						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						No. Type						B001	
J. Additional Descriptions for Materials Listed Above						K. Handling codes for Wastes Listed Above							
a. TOLUENE 32%, ALCOHOLS 45%, METHYL ISOBUTYL KETONE 10%, SOLIDS 8%, WATER 5%.						b.							
c.						d.							
PIN NO: 001851-FB.													
b.						d.							
15. Special Handling Instructions and Additional Information AVOID EXPOSURE TO FUMES. AVOID CONTACT OF LIQUIDS WITH SKIN AND EYES.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name H. J. MELOFCHIK					Signature <i>[Signature]</i>		Date Month Day Year 01 19 87						
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name MICHAEL HENNESSY					Signature <i>[Signature]</i>		Date Month Day Year 01 19 87						
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name					Signature		Date Month Day Year						
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name					Signature		Date Month Day Year						

NJA0166799

**Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D 9 9 0 1 2 1 3 7 2 7		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.*					
3. Generator's Name and Mailing Address GANES CHEMICALS, INC., 611 BROAD STREET, CARLSTADT, NJ 07072						A. State Manifest Document Number NJA0159779							
						B. State Gen. ID SAME							
4. Generator's Phone (201) 438-3433						C. State Transporter 1 ID NJDEPS5771							
5. Transporter 1 Company Name CONTINENTAL CARRIER						6. US EPA ID Number NJ D 9 9 0 7 2 9 6 5 8							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address SOLVENT RECOVERY SERVICE of NEW JERSEY INC., 1200 SYLVAN ST., LINDEN, NJ 07036						10. US EPA ID Number NJ D 0 0 2 1 8 2 9 9 7							
						E. State Transporter 2 ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone (201) 862-2000							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						No. Type							
a. Hazardous waste, solid, N.O.S., ORM-E, NA9189						003 DM		1600		P		D001	
b. Hazardous waste, solid, N.O.S., ORM-E, NA9189						004 DM		1300		P		D002 & D001	
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling codes for Wastes Listed Above							
3 DMS PIN 006766GD													
4 DMS PIN 006766GD & 006765GD													
a.						a.							
b.						b.							
15. Special Handling Instructions and Additional Information													
AVOID EXPOSURE TO FUMES. AVOID CONTACT OF MATERIAL WITH SKIN AND EYES.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						Printed/Typed Name		Signature		Date			
						W.J. MELOFCHIK		<i>W J Melofchik</i>		12/18/86			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name		Signature		Date			
						<i>Michael Thompson</i>		<i>[Signature]</i>		12/18/86			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name		Signature		Date			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Printed/Typed Name		Signature		Date			

NJ A0159779

**Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D 0 1 9 1 2 1 3 7 2 7		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.*					
3. Generator's Name and Mailing Address CANES CHEMICALS, INC., 611 BROAD STREET, CARLSTADT, NJ 07072				A. State Manifest Document Number		NJA0159778							
				B. State Gen. ID SAHS									
4. Generator's Phone (201) 438-3433				6. US EPA ID Number NJ D 9 9 0 7 7 2 9 6 5 8		C. State Transporter 1 ID NJDEPS5771							
5. Transporter 1 Company Name CONTINENTAL CARRIER				8. US EPA ID Number		D. Transporter's Phone (201) 727-1188							
7. Transporter 2 Company Name SECURITY SERVICE				10. US EPA ID Number NJ D 0 0 2 1 8 2 8 9 7		E. State Transporter 2 ID							
9. Designated Facility Name and Site Address SOLVENT RECOVERY SERVICE OF NEW JERSEY INC. 1200 SYLVAN ST., LINDEN, NJ 07036						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone (201) 862-2000							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit W/Vol		15. Waste No.	
						No. Type							
a. WASTE FLAMMABLE LIQUID N.O.S. PHARMACEUTICAL BY-PRODUCTS IN TOLUENE, ALCOHOLS & MIX						FLAMMABLE/LIQUID UN1993		99 1 7 0 5 7 6 1 2				D001	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling codes for Wastes Listed Above							
Toluene 32%, Alcohols 45%, Methyl Isobutyl Ketone 10%, Solids 8%, Water 5%.													
PIN No. 001851-FB.													
15. Special Handling Instructions and Additional Information													
AVOID EXPOSURE TO FUMES. AVOID CONTACT OF LIQUID WITH SKIN AND EYES.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name <i>[Signature]</i>				Signature <i>[Signature]</i>		Date Month Day Year 1 2 1 2 8 5							
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <i>Michael Honnigsoy</i>				Signature <i>[Signature]</i>		Date Month Day Year 1 1 1 1 1 1							
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name				Signature		Date Month Day Year							
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name				Signature		Date Month Day Year							

NJA0159778

Division of Waste Management
CN 028, Trenton, NJ 08625

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N J 0 0 0 1 2 1 3 7 2 X		2. Page 1 of 1		Information in the shaded areas is not required by Federal law *	
3. Generator's Name and Mailing Address GARRS CHEMICALS, INC. 611 BROAD STREET, CARLSTADT, NJ 07001				A. State Manifest Document Number NJA0159777			
4. Generator's Phone (201) 436-3433				B. State Gen. ID SAME			
5. Transporter 1 Company Name CONTINENTAL CARRIERS		6. US EPA ID Number N J 0 0 0 1 2 1 3 7 2 X		C. State Transporter 1 ID NJDEPS5771			
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (201) 727-1188			
9. Designated Facility Name and Site Address NEW JERSEY SOLVENT RECOVERY SERVICE OF NJ INC. 1200 SYLVAN ST., LINDEN, NJ 07036				E. State Transporter 2 ID			
				F. Transporter's Phone			
				G. State Facility's ID			
				H. Facility's Phone (201) 682-2000			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
a. HAZARDOUS LIQUID A.O.S. PHARMACEUTICAL BY-PRODUCTS IN TOLUENE, ALCOHOLS, & KERO.				No. Type		14. Unit Wt/Vol	
				1		554	
						D001	
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above Toluene 30%, Alcohol 40%, Methylisobutyl Ketone 15%, Solids 10%, Water 5%				K. Handling codes for Wastes Listed Above			
a. PIN - NO.001851-FB				b.			
c.				d.			
15. Special Handling Instructions and Additional Information AVOID EXPOSURE TO FUMES. AVOID CONTACT OF LIQUID WITH SKIN AND EYES.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.							
Printed/Typed Name William J. Melotchik				Signature <i>[Signature]</i>		Date 11/19/86	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name William J. Melotchik				Signature <i>[Signature]</i>		Date 11/19/86	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Date Month Day Year	

NJA0159777

1. EPA ID: M71D1010112113171212. HANDLER NAME: GANES CHEMICAL Inc.3. ADDRESS: 611 BROAD STR, CARLSTADT, NJ 070724. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 08/07/875. KIND OF EVALUATION COVERED BY THIS REPORT: II
(Choose one of the codes listed. Enter code in box.)6A. EVALUATION CATEGORY: I (Enter code in box. See reverse side for choice of codes.)7. DATE OF SUBSEQUENT EVALUATION: / / (Do NOT fill in this item unless you are reporting a subsequent evaluation. The date of the initial evaluation MUST be reported in item 5.)

8. AREA OF EVALUATION AND CLASS OF VIOLATION:

Enter in the appropriate box:

"X" if a violation is found.

"O" if no violations are found.

"Z" if the area evaluated is still under review.

"R" (used in the "GWM/Rel" box only) if a release is found.

"B" if both a release and violation are found ("GWM/Rel" box only).

CLASS OF VIOLATION

AREA OF EVALUATION
(Enter an X, O, Z, R, or B in each Area which was evaluated)

	GWM/Rel	Clo/PC	Fin Resp	Part B	Compt Schd	Manifest	Other	LDR
I						O	O	X
II						O	O	O

ENFORCEMENT ACTIONS:

Class of Vio	Area of Vio	Action Type (Use code)	Date Action Taken	Compliance Dates Scheduled	Verified	Penalty Assessed	Collected	Resp Agen (Use code)	Enf. Contact Person (Full Name)

Codes for Type of Enforcement Action:
01 = Interim Status Compliance Letter
02 = §3007 Info. Request
03 = Warning Letter/NOV
04 = §3008(a) Complaint
05 = §3008(a) Final Order
06 = §3013 Order (Initial)
07 = §3013 Order (Final)08 = §7003 Admin. Order
10 = Informal Action
11 = Civil Action (by DOJ)
12 = Filed Criminal Action
13 = NOV (From EPA to State)
14 = NOV (From State to EPA)15 = §3008(h) Complaint
16 = §3008(h) Final Order
17 = CERCLA §106 Admin. Order
18 = Civil Referral (to AG/DOJ)
19 = Final Judicial Order
20 = CERCLA §104 Fund ActivityCodes for Responsible Agency:
E = EPA
X = EPA Oversight
S = State9A. STATUS OF ENFORCEMENT ACTION: / ACTIVE / VIOLATING / RESOLVED / RESCINDED / PROGRESSED STATUS DATE: / /
(Place an "X" in front of the current status of the enforcement action. See reverse side for status definitions.)

9. COMPLIANCE SCHEDULE MILESTONES (See reverse side.)

10. COMMENTS: (Limit each comment to 80 characters. Up to 99 comments possible. Use reverse side of page, if necessary.)

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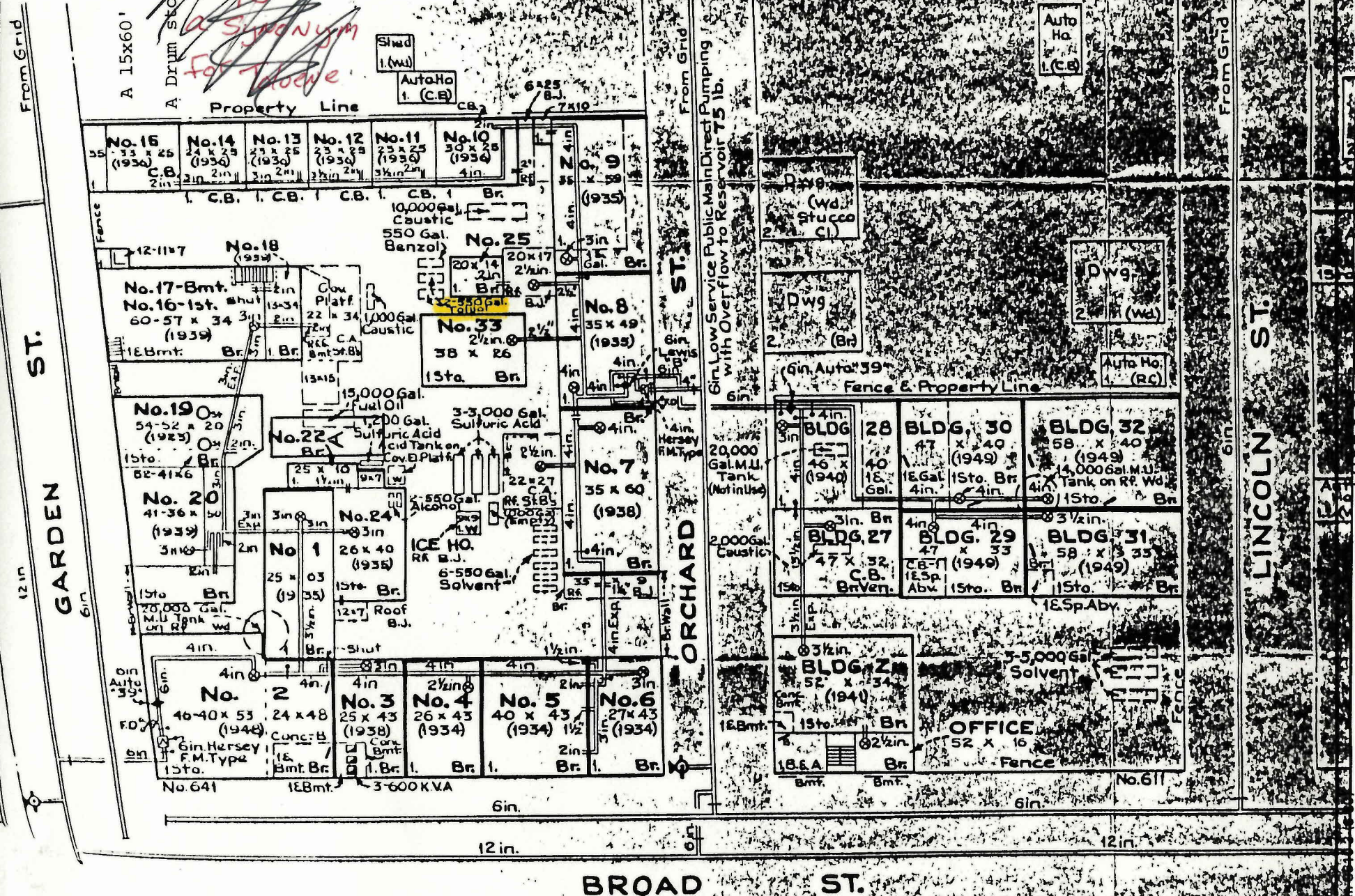
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GARDEN

FEB 14 1989

Honorable J.F. Greene
Administrative Law Judge (A-110)
Office of Administrative Law Judge
U.S. Environmental Protection Agency
401 M Street, S. W.
Washington, DC 20460

Re: Ganes Chemical, Inc.
Docket No. II RCRA 88-0121

Dear Judge Greene:

I refer to your Order dated January 30, 1989 regarding the date for an informal settlement conference.

The parties have been in contact and have tentatively scheduled a meeting for March 7, 1989 at 11:00 am.

Sincerely,

Stuart Keith
Legal Advisor
Waste and Toxic Substances Branch
Office of Regional Counsel

cc: Karen Maples (RHC)

Jim Sullivan, (2AWM)

Richard Ericsson, Esq.
Farer, Siegal & Fersko

880 2 8 777

on 7/21/77
the following information
was received from the
Bureau of the Census
regarding the 1976
census of the United States

the following information
was received from the
Bureau of the Census
regarding the 1976
census of the United States

the following information
was received from the
Bureau of the Census
regarding the 1976
census of the United States

the following information
was received from the
Bureau of the Census
regarding the 1976
census of the United States

the following information
was received from the
Bureau of the Census
regarding the 1976
census of the United States

RECORD OF COMMUNICATION	<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)		
	(Record of item checked above)		
TO: File	FROM: J. SULLIVAN	DATE 8/11/88	
SUBJECT GANES Chemical (CARLSTADT)		TIME 11:00 AM	
SUMMARY OF COMMUNICATION <p>Ganes has recently submitted a new waste profile sheet to SRS (Linden) stating that their waste is an "F" waste</p> <p>from Boleslaw Czachor,</p> <p>RTDP upon inspecting GANES SRS</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

December 6, 1988

Honorable Gerald Harwood
Chief, Administrative Law Judge (A-110)
U.S. Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

Re: In the matter of Ganes Chemical Company, Inc.
Docket No. II RCRA-88-0121

Dear Judge Harwood:

Pursuant to 40 C.F.R. 22.21(a) of the Consolidated Rules of Practice, I am transmitting a copy of the Complaint and Notice of Opportunity for Hearing in the above captioned matter along with Respondent's Answer and Request for Hearing. Please assign an Administrative Law Judge to serve as Presiding Officer.

Sincerely,

A handwritten signature in cursive script that reads "Karen Maples".

Karen Maples
Regional Hearing Clerk
Region II

Enclosure (2)

cc: Counsel for Respondent:

Richard J. Ericsson, Esq.
FARER, SIEGEL & FERSKO
425 North Avenue East
P.O. Box H
Westfield, New Jersey 07091
(201) 789-8550

Counsel for Complainant:

Ruth Rosenberg, Esq.
USEPA, Office of Regional Counsel
(212) 264-4666
(FTS) 264-4666

FARER SIEGAL FERSKO

A PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

425 NORTH AVENUE EAST

P.O. BOX H

WESTFIELD, NEW JERSEY 07091

(201) 789-8550

FAX (201) 789-8660

ENVIRONMENTAL PROTECTION
AGENCY REGION II

88 DEC -6 AM 9:23

REGIONAL HEARING
CLERK

HENRY FARER

MARTIN F. SIEGAL

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ROBYN L. REIKEN

RICHARD J. ERICSSON

ANN M. WAEGER

HEIDI S. MINUSKIN

DAVID R. GOLDBERG

December 5, 1988

Via Federal Express

Regional Hearing Clerk
United States Environmental
Protection Agency, Region II
26 Federal Plaza, Room 505
New York, New York 10278

Re: In the Matter of Ganes Chemical Company, Inc.
611 Broad Street Carlstadt, New Jersey
NJD001213727
Respondent, Proceeding under §3008 of RCRA
Docket No. II RCRA 88-0121
Answer and Request for a Hearing
Our file no. 271409

Dear Sir:

This firm represents Ganes Chemical Company, Inc. ("Ganes") with respect to the Administrative Complaint, Docket No. II RCRA 88-0121. Ganes writes today to answer the complaint and to request an Administrative Hearing concerning the above referenced complaint and compliance order.

Ganes denies the contention in paragraph 6 of the complaint that Ganes had shipped restricted waste to an offsite treatment facility without the required notification, in violation of 40 C.F.R. §268.7(a)(1).

Ganes also denies the allegations in paragraph 7 of the Administrative Complaint which alleges that Ganes failed to accurately identify on hazardous wastes manifests the hazardous waste by its appropriate hazardous waste number, in violation of N.J.A.C. 7.26-7.4.

Ganes also contends that the proposed civil penalty set forth in the Administrative Complaint is excessive and not supported by the facts.

FARER SIEGAL FERSKO

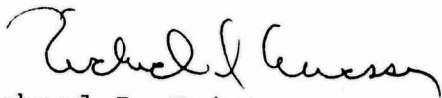
A PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

Regional Hearing Clerk
United States Environmental
Protection Agency, Region II
December 5, 1988

-2-

Ganes requests an informal pre-hearing conference to discuss the alleged violations and the proposed civil penalty of the Administrative Complaint. Ganes reserves the right to amend this answer and request for a hearing at any time prior to or subsequent to the informal pre-hearing conference.



Richard J. Ericsson

RJE:bam:14

cc: Mr. William Melofchik
Ruth Rosenberg, Esq.

U.S. EPA
AGENCY RO II UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

94 APR 21 PM 3:51

INFO. SERV. SEC.-----X

In The Matter Of :
Ganes Chemical, Inc. :
611 Broad Street :
Carlstadt, New Jersey 07072 :
NJD001213727 :
:

COMPLAINT, COMPLIANCE ORDER
AND NOTICE OF OPPORTUNITY
FOR HEARING

Proceeding Under Section 3008 :
of the Resource Conservation :
and Recovery Act :
-----X

Docket No. II RCRA 88-0121

COMPLAINT

This civil administrative proceeding is instituted pursuant to Section 3008 of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. § 6901 et seq. ("RCRA" or the "Act"). Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), provides that the Administrator of the U.S. Environmental Protection Agency ("EPA") may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the federal program. The State of New Jersey received final authorization to administer its hazardous waste program on February 21, 1985. Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes EPA to enforce the provisions of the authorized State program.

Until the State of New Jersey amends its hazardous waste program to incorporate the requirements under the Hazardous and Solid Waste Amendments ("HSWA"), 42 U.S.C. § 6901 et seq., and receives authorization to enforce such requirements, EPA retains primary responsibility for implementation of said requirements. HSWA amended the Act to include the Land Disposal Restriction Rule ("LDR Rule" or "Land Ban Rule") under Section 3004 of the Act, 42 U.S.C. § 6924. The State of New Jersey has not amended its hazardous waste program to incorporate the LDR Rule; therefore, EPA has primary and, at the present time, sole implementation authority for the LDR Rule.

The Director of the Air & Waste Management Division of the U.S. Environmental Protection Agency ("EPA"), Region II, Complainant in this proceeding, has determined that Respondent, Ganes Chemical, Inc., has violated Sections 3002 and 3004 of the Act, 42 U.S.C. § 6922 and § 6924, and the requirements promulgated pursuant to the Act as hereinafter specified:

1. Respondent owns and operates a facility located at 611 Broad Street, Carlstadt, New Jersey 07072. Respondent is a "person" as that term is defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and in 40 C.F.R. § 260.10.

2. On July 11, 1980, Respondent informed EPA that it conducts activities at its facility involving "hazardous waste" as that term is defined in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5) and in 40 C.F.R. § 260.10. By application dated November 19, 1980, Respondent requested a permit to conduct its hazardous waste activities.

3. Respondent is a "generator" of hazardous wastes as that term is defined in 40 C.F.R. § 260.10 and N.J.A.C. § 7:26-1.4.

4. On or about August 7, 1987, an inspection of the facility was conducted by a duly-designated representative of EPA pursuant to Section 3007 of the Act, 42 U.S.C. § 6927. Said inspection was conducted to determine compliance with specific state and federal regulations for the management of hazardous waste.

5. 40 C.F.R. Parts 262, 265 & 268 set federal standards for generators of hazardous waste and interim status facilities which treat, store and dispose of hazardous waste. N.J.A.C. § 7:26 establishes New Jersey requirements for generators of hazardous wastes.

6. 40 C.F.R. § 268.7(a) requires a generator to test his waste or an extract developed using the test method described in Appendix I of 40 C.F.R. Part 268, or to use knowledge of the waste, to determine if the waste is restricted from land disposal under 40 C.F.R. Part 268. 40 C.F.R. § 268.7(a)(1) requires the generator to notify a treatment facility in writing of the appropriate treatment standards set forth in Subpart D of 40 C.F.R. Part 268. The notice must include the following information:

- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standard;
- (iii) The manifest number associated with the shipment of the waste; and
- (iv) Waste analysis data, where available.

At or about the time of the above referenced inspection, the Respondent had shipped restricted waste to an off-site treatment facility without the required notification. Therefore, Respondent violated 40 C.F.R. § 268.7(a)(1).

7. N.J.A.C. § 7:26-7.4 requires the generator to prepare a manifest with the accurate hazardous waste number. At or about the time of the above referenced inspection, the Respondent had failed to accurately identify on hazardous waste manifests, the hazardous waste by its appropriate hazardous waste number. Therefore, Respondent violated N.J.A.C. § 7:26-7.4.

PROPOSED CIVIL PENALTY

In view of the violations referenced above, and pursuant to the authority of Section 3008 of RCRA, Compliant herewith proposes the assignment of a civil penalty in the amount of eight thousand nine hundred and ninety dollars (\$8,990) against GANES CHEMICAL, INC. as follows:

For violation of N.J.A.C. § 7:26-7.4.....	\$6,000
For violation of 40 C.F.R. § 268.7(a)(1).....	\$2,990
	<u>\$8,990</u>

COMPLIANCE ORDER

Based upon the foregoing, and pursuant to the authority of Section 3008 of RCRA, Complainant herewith issues the following Compliance Order against Respondent herein:

1. Respondent shall, upon the effective date of this Compliance Order, comply with 40 C.F.R. Part 268, when Respondent generates and ships restricted waste, as identified in 40 C.F.R. Part 268, to off-site treatment facilities. Specifically, pursuant to 40 C.F.R. § 268.7(a)(1), Respondent shall include notifications to treatment facilities which include the following information:

- (i) EPA Hazardous Waste Numbers;
- (ii) The corresponding treatment standard;
- (iii) The manifest number associated with the shipment of the waste; and
- (iv) Waste analysis data, where available.

2. Respondent shall, upon the effective date of this Compliance Order, comply with N.J.A.C. § 7:26-7.4 and correctly identify hazardous waste on its hazardous waste manifest.

NOTICE OF LIABILITY FOR ADDITIONAL CIVIL PENALTIES

Pursuant to the terms of Section 3008(a) of RCRA, a violator failing to take corrective action within the time specified in a Final Compliance Order is liable for a civil penalty of up to \$25,000 for each day of continued noncompliance.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

As provided in Section 3008(b) of RCRA, and in accordance with EPA's Consolidated Rules of Practices Governing the Administrative Assessment of Civil Penalties and the Revocation of Suspension of Permits, 40 C.F.R. Part 22, 45 Fed. Reg. 24363 (April 9, 1980) (a copy of which accompanies this Complaint, Compliance Order and Notice of Opportunity for Hearing), you have the right to request a hearing to contest any material fact set out in the Complaint, or to contest the appropriateness of the proposed penalty, or the terms of the Compliance Order. (Consistent with the provisions of Section 3008(b) of RCRA, should you request such a public hearing, notice of the hearing will be provided and the hearing will be open to the general public. However, in the absence of such a specific request, public notice of a scheduled hearing will not be published.)

To avoid being found in default, and having the proposed civil penalty assessed and the Compliance Order confirmed without further proceedings, you must file a written Answer to the Complaint, which may include a request for a hearing. Your Answer, if any, must be addressed to the U.S. Environmental Protection Agency, Regional Hearing Clerk, 26 Federal Plaza, New York, New York 10278, and must be filed within thirty (30) days of your receipt of this Complaint, Compliance Order, and Notice of Opportunity for Hearing.

Your Answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint, and should contain (1) a clear statement of the facts which constitute the grounds of your defense, and (2) a concise statement of the contentions which you intend to place in issue at the hearing.

INFORMAL SETTLEMENT CONFERENCE

Whether or not you request a hearing, the EPA encourages settlement of this proceeding consistent with the provisions of RCRA. At an informal conference with a representative of the Complainant you may comment on the charges and provide whatever additional information you feel is relevant to the disposition of this matter, including any actions you have taken to correct the violation, and any other special circumstances you care to raise. The Complainant has the authority to modify the amount of the proposed penalty, where appropriate, to reflect any settlement agreement reached with you in such a conference, or to recommend that any or all of the charges be dismissed, if the circumstances so warrant. Your request for any informal conference and other questions that you may have regarding this Complaint, Compliance Order, and Notice of Opportunity for Hearing should be directed to Ruth Rosenberg, Assistant Regional Counsel, Waste and Toxic Substance Branch, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, NY 10278, telephone (212) 264-4666.

Please note that a request for an informal settlement conference does not extend the thirty (30) day period during which a written Answer and Request for a hearing must be submitted. The formal conference procedure may be pursued as an alternative to or simultaneously with the adjudicatory hearing procedure. However, no penalty reduction will be made simply because such a conference is held.

Any settlement which may be reached as a result of such conference will be embodied in a written Consent Agreement and Consent Order to be issued by the Regional Administrator. Your signing of such Consent Agreement would constitute a waiver of your right to request a hearing on any matter stipulated to therein.

RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

Instead of filing an Answer requesting a hearing or requesting an informal settlement conference, you may choose to comply with the terms of the Compliance Order, and to pay the proposed penalty. In that case, payment should be made by sending a check in the amount of the penalty specified in the "Proposed Civil Penalty" section of this instrument to the Regional Hearing Clerk EPA - Region II, P.O. Box 360188M, Pittsburgh, PA 15251. A copy of the check should also be sent to Ruth Rosenberg, at the address referenced above. Your check must be made payable to the Treasurer of the United States of America.

DATED: *September 27, 1988*

COMPLAINANT



CONRAD SIMON

Director

Air and Waste Management Division
Environmental Protection Agency
Region II

TO: William Melofchik
Regulatory Affairs Manager
GANES CHEMICAL, INC.
611 Broad Street
Carlstadt, New Jersey 07072

cc: Karl Delaney
Assistant Director
Hazardous Waste Enforcement
New Jersey Department of
Environmental Protection
401 East State Street
Trenton, New Jersey 08854

Gerald Burke
Office of Regulatory Services
New Jersey Department of
Environmental Protection
401 East State Street
Trenton, New Jersey 08854

bcc: Joel Golumbek, 2AWM-HWC
Ruth Rosenberg, 2ORC-WTS
Bob Small, RATTIS Coordinator
Ton Moy, 2AWM-HWC
Karen Maples, 2RHC-PAB
George Meyer, 2AWM-HWC
Conrad Simon, 2AWM
✓ Jim Sullivan, 2AWM-HWC

Certificate of Service

This is to certify that on the *28th* day of *September*, 1988, I served a true and correct copy of the foregoing Complaint and a copy of the Consolidated Rules of Practice by certified mail to Mr. William Melofchik, Regulatory Affairs Manager, GANES CHEMICAL, INC., Carlstadt, New Jersey, 07072. I hand carried the original and a copy of the foregoing Complaint to the Regional Hearing Clerk.

Betty R. Bollinger

ATTACHMENT I

REASONING BEHIND PROPOSED PENALTY

Pursuant to 40 C.F.R. §§ 22.14(a)(4) and (5), EPA is providing you this statement explaining the reasoning behind the proposed penalty assessed for each violation cited in this Complaint. Attached to this Complaint you will find the EPA Penalty Computation Worksheet ("Worksheet") for each violation for which you have been assessed a proposed penalty. (Attachment II).

RCRA Section 3008(a)(3) states that the seriousness of the violation must be taken into account in assessing penalties. The seriousness of a violation is based on the potential for harm and extent of the deviation from a statutory or regulatory requirement, which provide the basis for determining the gravity based penalty.

1. For the violation of 40 C.F.R. § 268.7(a)(1).

- The "Potential for Harm" present in this violation was determined to be minor. The restricted waste shipped off-site was fuels blended then sent to cement kilns for use as a fuel substitute. The burning of restricted waste is considered environmentally less desirable than the recycling of such waste. Therefore, the upper-point of the applicable matrix cell was chosen.
- The "Extent of Deviation" present in the violation was determined to be major, because the applicable regulation was not complied with.
- Based upon these determinations, a "Matrix Cell Range" and "Per-day Assessment" were derived and entered on the attached worksheet. In sum, the "Total Penalty Amount" of \$2,990 was determined to be appropriate for the violation of 40 C.F.R. § 268.7(a)(1).

2) For the violation of N.J.A.C. § 7:26-7.4:

- The "Potential for Harm" present in this violation was determined to be moderate. The manifest system is designed to track hazardous waste from the point of generation until its final disposition (cradle to grave) so as to insure the proper disposal of these wastes. Hence, since the hazardous waste codes were incorrect, the statutory purpose of tracking waste was thwarted and the possibility of mishandling the waste was increased. Therefore, the mid-point of the applicable matrix cell was chosen.
- The "Extent of Deviation" present in the violation was determined to be moderate because an essential item required on the manifest was incorrectly completed.

- ° Based upon these determinations, a "Matrix Cell Range" and "Per-day Assessment" were derived and entered on the attached worksheet. In sum, the "Total Penalty Amount" of \$6,000 was determined to be appropriate for the violation of N.J.A.C. § 7:26-7.4.

ATTACHMENT II

Company Name: GANES CHEMICAL, INC.

Regulation Violated N.J.A.C. § 7:26-7.4

Assessments for each violation should be determined on separate work-sheets and totalled.

(If more space is needed, attach separate sheet).

Part I - Seriousness of Violation Penalty

- | | |
|--|--|
| 1. Potential for Harm: | <u>Moderate</u> |
| 2. Extent of Deviation: | <u>Moderate</u> |
| 3. Matrix Cell Range: | <u>\$7,999 to 5,000</u> |
| Penalty Amount Chosen: | <u>\$6,000</u> |
| Justification for Penalty Amount Chosen: | Mid-point of range
(see Attachment I) |
| 4. Per Day Assessment: | <u>\$6,000</u> |

Part II - Penalty Adjustments

- | | <u>Percentage Change*</u> | <u>Dollar Amount</u> |
|---|---------------------------|----------------------|
| 1. Good faith efforts to comply/lack of good faith: | <u>RESERVED</u> | <u>N/A</u> |
| 2. Degree of willfulness and/or negligence: | <u>RESERVED</u> | <u>N/A</u> |
| 3. History of noncompliance | <u>RESERVED</u> | <u>N/A</u> |
| 4. Other unique factors: | <u>RESERVED</u> | <u>N/A</u> |
| 5. Justification for Adjustments: | | |

* Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

6. Adjusted Per day Penalty (Line 4, Part I + Lines 1-4 Part II):	<u>\$6,000</u>
7. Number of Days of Violation:	<u>N/A</u>
8. Multi Day Penalty (Number of days X Line 6, Part II):	<u>N/A</u>
9. Economic Benefit of Noncompliance:	<u>N/A</u>
10. Total (Line 8 + 9, Part II):	<u>\$6,000</u>
11. Ability to Pay Adjustment:	
Justification for Adjustment:	<u>N/A</u>
12. Total Penalty Amount (must not exceed \$25,000 per day of violation):	<u>\$6,000</u>

ATTACHMENT III

Company Name: GANES CHEMICAL, INC.

Regulation Violated 40 C.F.R § 268.7(a)(1)

Assessments for each violation should be determined on separate work-sheets and totalled.

(If more space is needed, attach separate sheet).

Part I - Seriousness of Violation Penalty

- | | |
|---|---|
| 1. Potential for Harm: | <u>MINOR</u> |
| 2. Extent of Deviation: | <u>MAJOR</u> |
| 3. Matrix Cell Range: | <u>\$2,999 - 1,500</u> |
| Penalty Amount Chosen: | <u>\$2,990</u> |
| Justification for Penalty
Amount Chosen: | High-point of range
(see Attachment I) |
| 4. Per Day Assessment: | <u>\$2,990</u> |

Part II - Penalty Adjustments

- | | <u>Percentage Change*</u> | <u>Dollar Amount</u> |
|---|---------------------------|----------------------|
| 1. Good faith efforts to comply/lack of good faith: | <u>RESERVED</u> | <u>N/A</u> |
| 2. Degree of willfulness and/or negligence: | <u>RESERVED</u> | <u>N/A</u> |
| 3. History of noncompliance | <u>RESERVED</u> | <u>N/A</u> |
| 4. Other unique factors: | <u>RESERVED</u> | <u>N/A</u> |
| 5. Justification for Adjustments: | | |

* Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

6.	Adjusted Per day Penalty (Line 4, Part I + Lines 1-4, Part II):	<u>\$2,990</u>
7.	Number of Days of Violation:	<u>N/A</u>
8.	Multi Day Penalty (Number of days x Line 6, Part II):	<u>N/A</u>
9.	Economic Benefit of Noncompliance:	<u>N/A</u>
	Justification:	
10.	Total (Line 8 + 9, Part II):	<u>\$2,990</u>
11.	Ability to Pay Adjustment:	
	Justification for Adjustment:	<u>N/A</u>
12.	Total Penalty Amount (must not exceed \$25,000 per day of violation):	<u>\$2,990</u>

ATTACHMENT III

MATRIX

EXTENT OF DEVIATION FROM REQUIREMENT

P O T E N T I A L F O R H A R M		MAJOR	MODERATE	MINOR
	MAJOR	\$25,000 to 20,000	\$19,999 to 15,000	\$14,999 to 11,000
	MODERATE	\$10,999 to 8,000	\$7,999 to 5,000	\$4,999 to 3,000
	MINOR	\$2,999 to 1,500	\$1,499 to 500	\$499 to 100

U.S. ENVIRONMENTAL PROTECTION
AGENCY, REGION II
NEW YORK, N.Y.

1989 JUN 28 PM 2:00
PERMITS ADMINISTRATION
BRANCH

NJD001213727

JUN 08 1989

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

Mr. Richard Ericsson
Farer, Seigal & Fersko
425 North Avenue East
P.O. Box H
Westfield, New Jersey 07091

Re: Ganes Chemical Incorporated
Docket No. II PCRA-88-0121

Dear Mr. Ericsson:

Enclosed is a copy of the Consent Agreement and Consent Order in the above-referenced proceeding, signed by the Regional Administrator of the U.S. Environmental Protection Agency.

Upon your receipt of this Order, the thirty-day period for payment of the civil penalty commences. Please arrange for payment of this penalty according to the instructions given in the Agreement.

Sincerely,

Stuart N. Keith
Legal Advisor
Waste and Toxic Substances Branch
Office of Regional Counsel

Enclosure

cc: Gerard Burke (NJDEP)

bcc: Bob Small (WH-527)
Laura Livingston (2PM-PA)
Karen Haples (2RHC)
Joel Golumbek (2AWN-HWC)
James Sullivan (2AWN-HWC)
Ronald Gherardi (2PM-FIN)
Hon. J.F. Greene (ALJ)

100-100000-100000
100-100000-100000

JUN 08 1983

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

Mr. Richard Ericsson
Parker, Seigel & Parker
475 North Avenue East
P.O. Box 8
Newfield, New Jersey 07061
Per: Ganes Chemical Incorporated
P.O. Box 11, PCA-88-0131

Dear Mr. Ericsson:

Enclosed is a copy of the Consent Agreement and Consent Order
in the above-referenced proceeding, signed by the Regional
Administrator of the U.S. Environmental Protection Agency.

Upon your receipt of this Order, the thirty-day period for
payment of the civil penalty commences. Please arrange for
payment of this penalty according to the instructions given
in the Agreement.

Sincerely,

Stuart N. Keith
Local Advisor
Waste and Toxic Substances Branch
Office of Regional Counsel

Enclosure

cc: Gerard Burke (WJBP)

cc: Bob Smith (WH-237)
James Sullivan (JAM-WHC)
John Coleman (JAM-WHC)
Robert Gherard (JAM-WHC)
Don. J. F. Greene (ALJ)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

-----X
In the Matter of :
 :
GANES CHEMICALS, INC., : CONSENT AGREEMENT
 : AND
 : CONSENT ORDER
Respondent. :
 :
 : Docket No. II RCRA-88-0121
Proceeding Under Section 3008 of :
the Solid Waste Disposal Act, as :
amended. :
-----X

PRELIMINARY STATEMENT

This administrative proceeding was instituted pursuant to Section 3008 of the Solid Waste Disposal Act ("Act"), as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA" or "Amendments"). 42 U.S.C.A. §§ 6901-6991i (West 1983 & Supp. 1987).

Section 3006(b) of RCRA provides that the Administrator of the U.S. Environmental Protection Agency ("EPA") may, if certain criteria are met, authorize a state to operate the hazardous waste program in lieu of the EPA. 42 U.S.C.A. § 6926(b) (West 1983 & Supp. 1987). The State of New Jersey received its final authorization to administer its RCRA hazardous waste program on February 21, 1985. Even though the state is authorized to implement the hazardous waste program, Section 3008

of RCRA permits EPA to enforce the provisions of the state authorized program. 42 U.S.C.A. § 6928 (West 1983 & Supp. 1988).

Section 3006(g) of RCRA provides that the Administrator of the EPA has the authority to carry out any requirement or prohibition imposed by HSWA, and the regulations promulgated thereunder, in each state, unless the state program is finally authorized (or is granted interim authorization) for such requirements. HSWA includes the Land Disposal Restriction Rule ("LDR Rule" or "Land Ban" Rule) under the amended Section 3004 of RCRA. 42 U.S.C.A. § 6924 (West 1983 & Supp. 1987). New Jersey has not received final or interim authorization for the HSWA requirements. Therefore, until the State of New Jersey amends its hazardous waste program to incorporate the requirements under HSWA and receives authorization to enforce such requirements, EPA retains sole authority for implementation and enforcement of the HSWA requirements, which includes the Land Ban regulations.

The Complainant in this proceeding, the Director of the Air and Waste Management Division, Region II, United States Environmental Protection Agency issued a Complaint, Compliance Order and Notice of Opportunity for Hearing to Ganes Chemicals, Inc. ("Respondent") on September 28, 1988. The Complaint charged Respondent with violating HSWA, the regulations promulgated pursuant to HSWA, the New Jersey Solid Waste Management Act ("SWMA") and the regulations promulgated pursuant to SWMA.

FINDINGS OF FACT

1. Respondent owns and operates a facility located at 611 Broad Street, Carlstadt, New Jersey 07072.

2. By notification dated July 11, 1980, Respondent informed EPA that it conducts activities at its facility involving "hazardous waste", as that term is defined by Section 1004(5) of RCRA (42 U.S.C.A. § 6903(5) (West 1983 & Supp. 1987)), 40 C.F.R. § 260.10 (1987), and N.J. Admin. Code tit. 7 § 26-1.4 (1987). By application dated November 19, 1980, Respondent requested a permit to operate its hazardous waste facility.

3. Respondent generates hazardous waste at its facility.

4. On August 7, 1987 a duly designated representative of the New Jersey Department of Environmental Protection ("NJDEP"), authorized by the EPA, conducted an inspection of the aforementioned facility (paragraph 1). The inspection was conducted for the purposes of determining compliance with the federal and state hazardous waste programs.

5. On August 7, 1987, the NJDEP inspector found that Respondent had shipped restricted waste, which it had

misclassified, to an off-site treatment facility without providing it with a written statement which includes the: (a) EPA Hazardous Waste Number; (b) corresponding treatment standard for the waste; (c) manifest number associated with the waste shipment; and (d) waste analysis data, where available.

6. On August 7, 1987, the NJDEP inspector found that Respondent had improperly identified on several New Jersey manifests, between November of 1986 and August of 1987, the hazardous waste number for those hazardous waste shipments.

CONCLUSIONS OF LAW

1. Respondent is a "person" as that term is defined in Section 1004(15) of RCRA (42 U.S.C.A. § 6903(15) (West 1983 & Supp. 1987)), 40 C.F.R. § 260.10 (1987), and N.J. Admin. Code tit. 7, § 26-1.4 (1987).

2. Respondent operates a "facility", as that term is defined in 40 C.F.R. § 260.10 (1987), at 611 Broad Street, Carlstadt, New Jersey 07072 which treats, stores and disposes of hazardous waste. (See also "hazardous waste facility" as that term is defined in N.J. Admin. Code tit. 7 § 26-1.4 (1987).)

3. Respondent is a "generator", as that term is defined in 40 C.F.R. § 260.10 (1987) and N.J. Admin. Code tit. 7, § 26-1.4 (1987), of hazardous waste at its facility.

4. Respondent is subject to the regulation set forth at 40 C.F.R. § 268.7(a)(1) (1987), which requires a generator to

determine if its waste, which is being shipped off-site, is restricted from land disposal under 40 C.F.R. §§ 268.1-268.50 (1987) and, if it is, then to notify in writing, pursuant to the requirements of the regulations, the treatment facility of the appropriate treatment standards set forth in 40 C.F.R. §§ 268.40-286.44 (1987).

5. Respondent's failure to notify the treatment facility in writing (as specified in the Findings of Fact, paragraph 5), is a violation of the regulation set forth at 40 C.F.R. §§ 268.7(a)(1) (1987).

6. Respondent's failure to meet the requirements of the regulation set forth at 40 C.F.R. § 268.7(a)(1) (1987) constitutes a failure or refusal to comply with 40 C.F.R. § 268.7(a)(1) (1987), and is a violation of Section 3002 and Section 3008 of RCRA (42 U.S.C.A. § 6922, 6928 (West 1983 & Supp. 1987)).

7. Respondent is subject to the regulation set forth at N.J. Admin. Code tit. 7, § 26-7.4 which requires that the generator who ships hazardous waste off-site prepare a manifest form (N.J. Admin. Code tit. 7, § 26-7.4(a)(3) (1987)) and that the manifest form contain specific information (N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987)).

8. Respondent's failure to properly identify the hazardous waste (as specified in the Findings of Fact, paragraph 6), is a violation of the regulation set forth at N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987).

9. Respondent's failure to meet the requirement of N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987), constitutes a failure or refusal to comply with N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987), and is a violation of the New Jersey Solid Waste Management Act (N.J. State Ann. tit. 13, §§ 13:1E-176 (West 1979 & Supp. 1987)).

CONSENT AGREEMENT

Based upon the foregoing, and pursuant to Section 3008 of RCRA (42 U.S.C.A. § 6928 (West 1983 & Supp. 1987)), and the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits" (40 C.F.R. § 22.18 (1987)), it is hereby agreed as follows:

1. Respondent shall comply with:

- (a) the applicable requirements of Sections 3002 and 3004 of RCRA as amended by HSWA (42 U.S.A.C. §§ 6922(a)(1), (4), 6924(a)(1), (c), (d), (e), (g), (h), (j), (m) (West 1983 & Supp. 1987));
- (b) 40 C.F.R. §§ 268.1-268.50; and
- (c) N.J. Admin. Code tit. 7, § 26-7.4.

2. Respondent shall pay, by cashier's or certified check, a civil penalty for the violations cited herein in the amount of seven thousand, one hundred ninety dollars (\$7,190.00) payable

to the Treasurer, United States of America, and mailed to:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region II
P.O. Box 360188M
Pittsburgh, Pennsylvania 15251

The payment shall be identified as Ganes Chemical, Inc. Docket No.
II RCRA-88-0121. Payment is due within thirty (30) days after the
Regional Administrator signs this Consent Agreement and Consent
Order. A copy of your payment shall be sent to:

Stuart Keith
Legal Advisor
Waste and Toxic Substances Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

a. Failure to pay the penalty in full according to the
above provisions will result in referral of this matter to the
United States Attorney for collection.

b. Further, if payment is not received on or before the due
date, interest will be assessed at the annual rate established
by the Secretary of Treasury pursuant to 31 U.S.C. § 3717 (1982),
on the overdue amount from the effective date of this Consent
Agreement and Consent Order through the date of payment. In
addition, a late payment handling charge of twenty dollars
(\$20.00) will be assessed if payment is not received by the due
date, with an additional charge of ten dollars (\$10.00) for each
subsequent thirty (30) day period. A six percent (6%) per annum
penalty also will be applied on any principal amount not paid
within ninety (90) days of the due date.

3. Pursuant to 40 C.F.R. § 22.18 (1987), for the purposes of this proceeding, Respondent: (1) admits the jurisdictional allegations of the Complaint; (2) neither admits nor denies the factual allegations contained in the Complaint; and (3) consents to the assessment of a civil penalty in paragraph 2 of the Consent Agreement.

4. The executed Consent Agreement and Consent Order by the Regional Administrator constitutes full settlement of all liabilities that might have attached as a result of the allegations of the Complaint.

5. Respondent waives its right to request a Hearing on this matter, has read the foregoing Agreement, believes that it is reasonable and consents to its issuance and its terms.

6. Each undersigned signatory of this Agreement certifies that he or she is fully authorized to enter into the terms and conditions of this Agreement.

RESPONDENT:

BY:


GANES CHEMICALS, INC.

NAME:
(Please Print)

WILLIAM MELOFCHIK

TITLE:


REGULATORY AFFAIRS MANAGER

DATE:

MAY 17, 1989

COMPLAINANT:

BY:

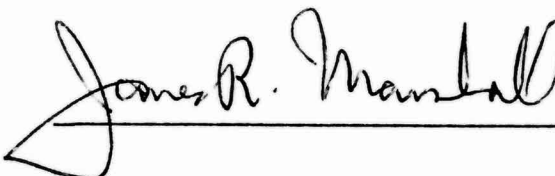

CONRAD SIMON
Director
Air and Waste Management Division
U.S. Environmental Protection
Agency - Region II

DATE:

June 5, 1989

CONSENT ORDER

The Regional Administrator of the U.S. Environmental Protection Agency, Region II, concurs in the foregoing Consent Agreement. The Agreement entered into by the parties is hereby approved and issued, as an Order, effective immediately.



U.S. Environmental Protection
Agency - Region II
26 Federal Plaza
New York, New York 10278

DATE:

6/5/89

JUN 28 1989

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

Mr. Richard Ericsson
Farer, Seigal & Persko
425 North Avenue East
P.O. Box H
Westfield, New Jersey 07091

Re: Ganes Chemical Incorporated
Docket No. II RCRA-88-0121

Dear Mr. Ericsson:

Enclosed is a copy of the Consent Agreement and Consent Order in the above-referenced proceeding, signed by the Regional Administrator of the U.S. Environmental Protection Agency.

Upon your receipt of this Order, the thirty-day period for payment of the civil penalty commences. Please arrange for payment of this penalty according to the instructions given in the Agreement.

Sincerely,

Stuart N. Keith
Legal Advisor
Waste and Toxic Substances Branch
Office of Regional Counsel

Enclosure

cc: Gerard Burke (NJDEP)

bcc: Bob Small (WH-527)
Laura Livingston (2PM-PA)
Karen Maples (2RHC)
Joel Columbek (2AWN-HWC)
James Sullivan (2AWN HWC)
Ronald Gherardi (2PM-FIN)
Hon. J.F. Greene (ALJ)

JUN 28 1982

CERTIFIED MAIL--
RETURN RECEIPT REQUESTED

Mr. Richard Ericsson
Farver, Selig & Farver
432 North Avenue East
P.O. Box 8
Montclair, New Jersey 07041

Re: Canon Chemical Incorporated
Docket No. 11 RCR-88-0131

Dear Mr. Ericsson:

Enclosed is a copy of the Consent Agreement and Consent Order
in the above-referenced proceeding, signed by the Regional
Administrator of the U.S. Environmental Protection Agency.

Upon your receipt of this Order, the thirty-day period for
payment of the civil penalty commences. Please attach for
payment of this penalty according to the instructions given
in the Agreement.

Sincerely,

Edward W. Keith
Regional Administrator
Water and Toxic Substances Branch
U.S. Environmental Protection Agency

Enclosure

cc: Gerald Payne (WJBP)

cc: Bob Smith (WH-527)
Laura Livingston (2PM-PA)
Karen Maguire (2RHC)
Joel Golubek (2AMW-HWC)
Robert Gherardi (2PM-FIN)
Hon. J.E. Greene (ALJ)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

-----X
In the Matter of :
 : CONSENT AGREEMENT
GANES CHEMICALS, INC., : AND
 : CONSENT ORDER
Respondent. :
 :
 : Docket No. II RCRA-88-0121
Proceeding Under Section 3008 of :
the Solid Waste Disposal Act, as :
amended. :
-----X

PRELIMINARY STATEMENT

This administrative proceeding was instituted pursuant to Section 3008 of the Solid Waste Disposal Act ("Act"), as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA" or "Amendments"). 42 U.S.C.A. §§ 6901-6991i (West 1983 & Supp. 1987).

Section 3006(b) of RCRA provides that the Administrator of the U.S. Environmental Protection Agency ("EPA") may, if certain criteria are met, authorize a state to operate the hazardous waste program in lieu of the EPA. 42 U.S.C.A. § 6926(b) (West 1983 & Supp. 1987). The State of New Jersey received its final authorization to administer its RCRA hazardous waste program on February 21, 1985. Even though the state is authorized to implement the hazardous waste program, Section 3008

of RCRA permits EPA to enforce the provisions of the state authorized program. 42 U.S.C.A. § 6928 (West 1983 & Supp. 1988).

Section 3006(g) of RCRA provides that the Administrator of the EPA has the authority to carry out any requirement or prohibition imposed by HSWA, and the regulations promulgated thereunder, in each state, unless the state program is finally authorized (or is granted interim authorization) for such requirements. HSWA includes the Land Disposal Restriction Rule ("LDR Rule" or "Land Ban" Rule) under the amended Section 3004 of RCRA. 42 U.S.C.A. § 6924 (West 1983 & Supp. 1987). New Jersey has not received final or interim authorization for the HSWA requirements. Therefore, until the State of New Jersey amends its hazardous waste program to incorporate the requirements under HSWA and receives authorization to enforce such requirements, EPA retains sole authority for implementation and enforcement of the HSWA requirements, which includes the Land Ban regulations.

The Complainant in this proceeding, the Director of the Air and Waste Management Division, Region II, United States Environmental Protection Agency issued a Complaint, Compliance Order and Notice of Opportunity for Hearing to Ganes Chemicals, Inc. ("Respondent") on September 28, 1988. The Complaint charged Respondent with violating HSWA, the regulations promulgated pursuant to HSWA, the New Jersey Solid Waste Management Act ("SWMA") and the regulations promulgated pursuant to SWMA.

FINDINGS OF FACT

1. Respondent owns and operates a facility located at 611 Broad Street, Carlstadt, New Jersey 07072.

2. By notification dated July 11, 1980, Respondent informed EPA that it conducts activities at its facility involving "hazardous waste", as that term is defined by Section 1004(5) of RCRA (42 U.S.C.A. § 6903(5) (West 1983 & Supp. 1987)), 40 C.F.R. § 260.10 (1987), and N.J. Admin. Code tit. 7 § 26-1.4 (1987). By application dated November 19, 1980, Respondent requested a permit to operate its hazardous waste facility.

3. Respondent generates hazardous waste at its facility.

4. On August 7, 1987 a duly designated representative of the New Jersey Department of Environmental Protection ("NJDEP"), authorized by the EPA, conducted an inspection of the aforementioned facility (paragraph 1). The inspection was conducted for the purposes of determining compliance with the federal and state hazardous waste programs.

5. On August 7, 1987, the NJDEP inspector found that Respondent had shipped restricted waste, which it had

misclassified, to an off-site treatment facility without providing it with a written statement which includes the: (a) EPA Hazardous Waste Number; (b) corresponding treatment standard for the waste; (c) manifest number associated with the waste shipment; and (d) waste analysis data, where available.

6. On August 7, 1987, the NJDEP inspector found that Respondent had improperly identified on several New Jersey manifests, between November of 1986 and August of 1987, the hazardous waste number for those hazardous waste shipments.

CONCLUSIONS OF LAW

1. Respondent is a "person" as that term is defined in Section 1004(15) of RCRA (42 U.S.C.A. § 6903(15) (West 1983 & Supp. 1987)), 40 C.F.R. § 260.10 (1987), and N.J. Admin. Code tit. 7, § 26-1.4 (1987).

2. Respondent operates a "facility", as that term is defined in 40 C.F.R. § 260.10 (1987), at 611 Broad Street, Carlstadt, New Jersey 07072 which treats, stores and disposes of hazardous waste. (See also "hazardous waste facility" as that term is defined in N.J. Admin. Code tit. 7 § 26-1.4 (1987).)

3. Respondent is a "generator", as that term is defined in 40 C.F.R. § 260.10 (1987) and N.J. Admin. Code tit. 7, § 26-1.4 (1987), of hazardous waste at its facility.

4. Respondent is subject to the regulation set forth at 40 C.F.R. § 268.7(a)(1) (1987), which requires a generator to

determine if its waste, which is being shipped off-site, is restricted from land disposal under 40 C.F.R. §§ 268.1-268.50 (1987) and, if it is, then to notify in writing, pursuant to the requirements of the regulations, the treatment facility of the appropriate treatment standards set forth in 40 C.F.R. §§ 268.40-286.44 (1987).

5. Respondent's failure to notify the treatment facility in writing (as specified in the Findings of Fact, paragraph 5), is a violation of the regulation set forth at 40 C.F.R. §§ 268.7(a)(1) (1987).

6. Respondent's failure to meet the requirements of the regulation set forth at 40 C.F.R. § 268.7(a)(1) (1987) constitutes a failure or refusal to comply with 40 C.F.R. § 268.7(a)(1) (1987), and is a violation of Section 3002 and Section 3008 of RCRA (42 U.S.C.A. § 6922, 6928 (West 1983 & Supp. 1987)).

7. Respondent is subject to the regulation set forth at N.J. Admin. Code tit. 7, § 26-7.4 which requires that the generator who ships hazardous waste off-site prepare a manifest form (N.J. Admin. Code tit. 7, § 26-7.4(a)(3) (1987)) and that the manifest form contain specific information (N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987)).

8. Respondent's failure to properly identify the hazardous waste (as specified in the Findings of Fact, paragraph 6), is a violation of the regulation set forth at N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987).

9. Respondent's failure to meet the requirement of N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987), constitutes a failure or refusal to comply with N.J. Admin. Code tit. 7, § 26-7.4(a)(4)(vii) (1987), and is a violation of the New Jersey Solid Waste Management Act (N.J. State Ann. tit. 13, §§ 13:1E-176 (West 1979 & Supp. 1987)).

CONSENT AGREEMENT

Based upon the foregoing, and pursuant to Section 3008 of RCRA (42 U.S.C.A. § 6928 (West 1983 & Supp. 1987)), and the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits" (40 C.F.R. § 22.18 (1987)), it is hereby agreed as follows:

1. Respondent shall comply with:

- (a) the applicable requirements of Sections 3002 and 3004 of RCRA as amended by HSWA (42 U.S.A.C. §§ 6922(a)(1), (4), 6924(a)(1), (c), (d), (e), (g), (h), (j), (m) (West 1983 & Supp. 1987));
- (b) 40 C.F.R. §§ 268.1-268.50; and
- (c) N.J. Admin. Code tit. 7, § 26-7.4.

2. Respondent shall pay, by cashier's or certified check, a civil penalty for the violations cited herein in the amount of seven thousand, one hundred ninety dollars (\$7,190.00) payable

to the Treasurer, United States of America, and mailed to:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region II
P.O. Box 360188M
Pittsburgh, Pennsylvania 15251

The payment shall be identified as Ganes Chemical, Inc. Docket No. II RCRA-88-0121. Payment is due within thirty (30) days after the Regional Administrator signs this Consent Agreement and Consent Order. A copy of your payment shall be sent to:

Stuart Keith
Legal Advisor
Waste and Toxic Substances Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

a. Failure to pay the penalty in full according to the above provisions will result in referral of this matter to the United States Attorney for collection.

b. Further, if payment is not received on or before the due date, interest will be assessed at the annual rate established by the Secretary of Treasury pursuant to 31 U.S.C. § 3717 (1982), on the overdue amount from the effective date of this Consent Agreement and Consent Order through the date of payment. In addition, a late payment handling charge of twenty dollars (\$20.00) will be assessed if payment is not received by the due date, with an additional charge of ten dollars (\$10.00) for each subsequent thirty (30) day period. A six percent (6%) per annum penalty also will be applied on any principal amount not paid within ninety (90) days of the due date.

3. Pursuant to 40 C.F.R. § 22.18 (1987), for the purposes of this proceeding, Respondent: (1) admits the jurisdictional allegations of the Complaint; (2) neither admits nor denies the factual allegations contained in the Complaint; and (3) consents to the assessment of a civil penalty in paragraph 2 of the Consent Agreement.

4. The executed Consent Agreement and Consent Order by the Regional Administrator constitutes full settlement of all liabilities that might have attached as a result of the allegations of the Complaint.

5. Respondent waives its right to request a Hearing on this matter, has read the foregoing Agreement, believes that it is reasonable and consents to its issuance and its terms.

6. Each undersigned signatory of this Agreement certifies that he or she is fully authorized to enter into the terms and conditions of this Agreement.

RESPONDENT:

BY: 
GANES CHEMICALS, INC.

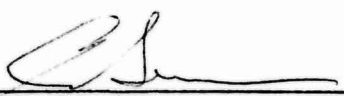
NAME: WILLIAM MELOFCHIK
(Please Print)

TITLE: REGULATORY AFFAIRS MANAGER

DATE: MAY 17, 1989

COMPLAINANT:

BY:

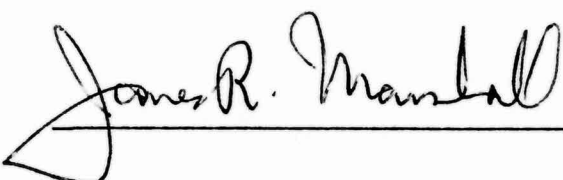

CONRAD SIMON
Director
Air and Waste Management Division
U.S. Environmental Protection
Agency - Region II

DATE:

June 5, 1989

CONSENT ORDER

The Regional Administrator of the U.S. Environmental Protection Agency, Region II, concurs in the foregoing Consent Agreement. The Agreement entered into by the parties is hereby approved and issued, as an Order, effective immediately.



U.S. Environmental Protection
Agency - Region II
26 Federal Plaza
New York, New York 10278

DATE:

6/5/89

Monday 12/4/89

II

Randy Viscomi 201-440-7000

- Take turnpike north to Exit 16 W
- get on Route 3 west
- go to Route 17 north to the Wooudge-Moonachie exit
- go up ramp make right at light (Moonachie Ave)
- mile down on right (pass airport & MANNY's) Lunch wagon in lot.

Dr John Vill

201-507-4300

GAVES 1:00pm William Melotchik

- Moonachie Ave to Hackensack St make a ~~right~~ left
- go down Hackensack until ~~you~~ see a pizzeria on corner (also chinese restaurant) this is Broad St make right
- faculty is on right, office on left red brick building

Monday 12/4/87

77 - Randy's on 301-440-7000

- Take things north to Box 16
- get on route 3 west
- go to route 17 north to the bridge
- leave out
- get up camp made up at night
- (Woodstock Ave)
- make down on night (camping)
- (young's) (camp) (in lot)

Dr John W. 501-257-4200
1:00pm William Woodstock

- Woodstock Ave to Woodstock St make a
- left
- in down Woodstock with
- appear on over (the down) this
- at make up
- finally up on night, off on left
- red back building



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON
DIRECTOR

LINO F. PEREIRA
DEPUTY DIRECTOR

03 MAR 1983

Ganes Chemical, Inc.
611-641 Broad Street
Carlstadt, NJ 07072

RE: Facility Operating Status

Dear Sir:

9H
HWMs
3/10/83

The Bureau of Hazardous Waste Engineering has reviewed your company's response to the Notice of Violation, Failure to Submit Annual Report. The Bureau finds that the response contains adequate information to determine the operating status of this facility with respect to N.J.A.C. 7:26-1 et seq., the New Jersey Hazardous Waste Management Regulations. The Bureau has determined that the company's hazardous waste treatment, storage or disposal facility as delineated in the company's RCRA Part A application and identified by the following EPA ID Number:

EPA ID NO. NJD001213727

has been excluded from regulations under N.J.A.C. 7:26-1.1 et seq. because your facility accumulates hazardous waste on-site for less than 90 days. This exclusion classifies your facility solely as a generator provided the following conditions are complied with:

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

New Jersey Is An Equal Opportunity Employer

5. For bulk accumulation of dry hazardous waste materials, the waste pile is managed according to the following:

- (i) The waste pile is no larger than 200 cubic yards; and
- (ii) The pile shall be placed on an impermeable base that is compatible with the waste; and
- (iii) Run-on shall be diverted away from the pile; and
- (iv) Any leachate and run-off from the pile must be collected and managed as a hazardous waste.

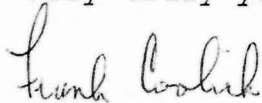
This written acknowledgement of the exclusion of the above identified facility from N.J.A.C. 7:26-1 et seq. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occurring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities" which would include the TSD facility annual report. It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

As a result of the conclusions previously made, the Notice of Violation entitled "Failure to Submit Annual Report" signed by Mr. David Shotwell is rescinded and need not be complied with.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,



Frank Coolick, Chief

Bureau of Hazardous Waste Engineering

FC:jb

cc Dave Shotwell
NJDEP, Division of Waste Management

Tom Taccone
USEPA, Region II

GANES CHEMICALS, INC.

SALES OFFICE: 1114 AVENUE OF THE AMERICAS
NEW YORK, N. Y. 10036

611 BROAD STREET
CARLSTADT, N. J. 07072

MANUFACTURERS OF
MEDICINAL CHEMICALS

February 17, 1983

done file

Mr. Joseph Cvinar
Grants Administration Branch, Room 932
Office of Policy and Management
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Cvinar:

As agreed with Leslie Peterson of your staff, I am sending you a copy of the letter I received from Richard A. Baker, Permits Administration Branch of your agency, documenting the declassification of our Carlstadt and Pennsville facilities as TSDF's.

I trust this satisfactorily answers the letters from Mr. Conrad Simon of your agency to our Pennsville facility, dated January 31, 1983, regarding liability insurance for TSDFs.

Kind Regards,

GANES CHEMICALS, INC.

W.J. Melofchik
W.J. Melofchik

WJM/mn
cc: Dr. R. Miller
Dr. C.O. Engeler
Mr. C. Simon ✓

FEB 24 2 51 PM '83
ENVIRONMENTAL AGENCY COLLECTION
NEW YORK, N.Y. 10001

AIR & WASTE MANAGEMENT
DIVISION

FEB 22 1 26 PM '83

U.S. ENVIRONMENTAL
PROTECTION AGENCY,
REGION II
NEW YORK, N.Y.

GAVER CHEMICALS INC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

Feb. 15, 1983

Mr. William Melofchik
Ganes Chemicals, Inc.
611 Broad Street
Carlstadt, New Jersey 07072

Subject: Carlstadt Plant - EPA ID NJD001213727
Pennsville Plant - EPA ID NJD064344575

Dear Mr. Melofchik:

As requested by letters dated November 8, 1982 and January 19, 1983 respectively, the two above-noted facilities of Ganes Chemicals have been declassified as treaters, storers and/or disposers of hazardous waste. They remain in our records, however, as generators of hazardous waste.

If you have any questions on this matter, please contact John Hajduk of my staff at (212)264-9880.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Richard A. Baker".

Richard A. Baker
Chief
Permits Administration Branch
Office of Policy & Management

cc: Richard Miller, Plant Manager
Frank Coolick, NJDEP

PERMITS ADMINISTRATION
FEB 24 2 51 PM '83
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

15 FEB 1983

Mr. William Melofchik
 Ganes Chemicals, Inc.
 611 Broad Street
 Carlstadt, New Jersey 07072

Subject: Carlstadt Plant - EPA ID NJD001213727
 Pennsville Plant - EPA ID NJD064344575

Dear Mr. Melofchik:

file
 As requested by letters dated November 8, 1982 and January 19, 1983 respectively, the two above-noted facilities of Ganes Chemicals have been declassified as treaters, storers and/or disposers of hazardous waste. They remain in our records, however, as generators of hazardous waste.

If you have any questions on this matter, please contact John Hajduk of my staff at (212)264-9880.

Sincerely yours,

Richard A. Baker
 Chief
 Permits Administration Branch
 Office of Policy & Management

cc: Richard Miller, Plant Manager
 Frank Coolick, NJDEP

2PM-PA:Hajduk:sj 2/11/83

CONCURRENCES

SYMBOL	2PM-PA	2PM-PA	2PM-PA				
SURNAME	Hajduk	Zambratto	Baker				
DATE	2/11/83	2/14/83	2/14/83				

JAN 1983

Mr. William Melofchik
Ganes Chemicals, Inc.
611 Broad Street
Carlsbad, New Jersey 07072

Subject: Carlsbad Plant - EPA ID N1000121372
Pennsville Plant - EPA ID N1006444275

Dear Mr. Melofchik:

As requested by letters dated November 8, 1982 and January 19, 1983 respectively, the two above-noted facilities of Ganes Chemicals have been designated as treatment, storage and/or disposers of hazardous waste. They remain in our records, however, as generators of hazardous waste.

If you have any questions on this matter, please contact John Hajduk of my staff at (212) 264-9880.

Sincerely yours,

Richard A. Baker
Chief
Permits Administration Branch
Office of Policy & Management

cc: Richard Miller, Plant Manager
Frank Coofick, HDEP

SPM-PA:Hajduk:sj 2/17/83

SYMBOL	SURNAME	DATE	CONCURRENCES
SPM-PA	Hajduk	2/17/83	
SPM-PA	Samuelto	2/17/83	
SPM-PA	Baker	2/17/83	

NJDO001213727

GANES CHEMICALS, INC.

SALES OFFICE: 1114 AVENUE OF THE AMERICAS
NEW YORK, N. Y. 10036611 BROAD STREET
CARLSTADT, N. J. 07072MANUFACTURERS OF
MEDICINAL CHEMICALS

November 8, 1982

Gett
check what activities
to stores < 90 days
delete C119, 1103, 1105, date

Dr. Richard Baker
Chief of Permits Admin. Branch
EPA Region II
26 Federal Plaza
New York, New York, 10278

Dear Dr. Baker:

JR
persons
11/23/82

This is to inform you that Ganes Chemicals, Inc., 611 Broad St., Carlstadt, N.J. 07072 is not a TSD facility. We are a generator only. We would appreciate it if you would change your records to indicate this.

Thank you for your cooperation.

Very truly yours,

GANES CHEMICALS, INC.

William Melofchik

William Melofchik

WM/MN

cc: J. Vill
F. Coolick
C. Engeler

NOV 12 4 06 PM '82
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007
PERMITS BRANCH

GAINES CHEMICALS, INC.

GANES CHEMICALS, INC.

SALES OFFICE: 1114 AVENUE OF THE AMERICAS
NEW YORK, N. Y. 10036611 BROAD STREET
CARLSTADT, N. J. 07072MANUFACTURERS OF
MEDICINAL CHEMICALS

① CARLSTADT : NJD 001 213 727 February 4, 1983
• PENNSVILLE : NJD 064 344 575

RECEIVED
FEB 25 11 30 AM '83
ENVIRONMENTAL
N. J. DEPARTMENT OF
N. J. DEPARTMENT OF

*done
file*

Mr. J. Hajduk
EPA Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Hajduk:

I am looking forward to receiving the letter you promised during our telephone conversation of February 3, 1983, confirming the removal of our facilities in Carlstadt and Pennsville from your records as TSDF's. As you know, both facilities are generators only.

If you have not already done so, Mr. Hajduk, I would appreciate it if you would insure that the NJ DEP, div. of Waste Management, Bureau of Engineering Review and the Bureau of Compliance and Enforcement are made aware of our status as a generator only. Apparently there has been some confusion over submitting reports. Since we were listed as TSDF's in EPA's computer printout the N.J. DEP wanted a report on our activities as TSDF's. They were informed by copy of our letter to Dr. Richard Baker that we are only generators, not TSDF's. This I was told recently by Mr. Nedick of the N.J. DEP Engineering Review Bureau, is not adequate to resolve the issue. Notification from EPA on our status as generators only is required. It is my understanding that a copy of your aforementioned letter sent to Mr. Frank Coolick of N.J. DEP, Div. of Waste Management, Bureau of Engineering and a copy to Mr. David Shotwell of the Bureau of Compliance & Enforcement would suffice.

Mr. J. Hajduk, EPA Region II

February 4, 1983

Thank you for your time, cooperation and assistance in my efforts to bring this matter to a satisfactory conclusion.

Kind Regards,

GANES CHEMICALS, INC.



W.J. Melofchik

WJM/mn

cc: Dr. R. Miller
Dr. R. Baker
Dr. C. Engeler
Mr. F. Coolick
Mr. D. Shotwell
Mr. W. Nedick.

FEB 17 1983

Handwritten signature

GANES CHEMICALS, INC.

SALES OFFICE: 1114 AVENUE OF THE AMERICAS
NEW YORK, N. Y. 10036

611 BROAD STREET
CARLSTADT, N. J. 07072

MANUFACTURERS OF
MEDICINAL CHEMICALS

February 4, 1983

Mr. F. Coolick
N.J. Dept. of Environmental Protection
Bureau of Engineering Review
32 East Hanover Street
Trenton, N.J. 08625

Dear Mr. Coolick:

I was recently informed by Mr. Nedick that our letter to Mr. Baker of the EPA, Region II, in response to the NOV sent to Ganes Chemical, Inc., dated November 5, 1982 was not adequate. Mr. Nedick recommended three courses of action, each of which would satisfy your requirements. They are as follows:

1. Submit an annual report on our TSDF activities.
2. Have the EPA supply a letter either directly or through Ganes to the NJ DEP confirming our status as a generator only and not a TSDF.
3. Request an exclusion from your department from the reporting requirement.

Since Ganes has not accepted nor stored for more than 90 days any hazardous waste and since we are a generator only, option 1 above would not be valid for our operation. I have spoken to Mr. Hajduk of the EPA, Region II, and he assured me that a written response clarifying our generator only status would be provided within a few days. This letter, according to Mr. Nedick, either sent directly to you or through us would constitute a satisfactory response to the aforementioned NOV.

RECEIVED
FEB 25 10 31 AM '83
ENVIRONMENTAL PROTECTION
AGENCY
N.J. DEPT. OF ENVIRONMENTAL
PROTECTION
TRENTON, N.J. 08625

Mr. F. Coolick
N.J. Dept. of Environmental Protection
Bureau of Engineering Review

February 4, 1983

However, to insure compliance on our part, I am requesting an exclusion from the reporting requirement based upon the fact that Ganes is only a generator and not a TSDF. When the EPA regulations were first promulgated we filled out part "A" on the form to register as an interim storage facility. As the regulatory situation began to clarify, Ganes in fact remained a generator only. Therefore, as previously stated, we have no activity as a TSDF and have nothing to report.

King Regards,

GANES CHEMICALS, INC.



W.J. Melofchik

WJM/mn

cc: Dr. R. Miller
Dr. C. Engeler
Mr. W. Nedick
Mr. J. Hajduk

GANES CHEMICALS, INC.

SALES OFFICE: 1114 AVENUE OF THE AMERICAS
NEW YORK, N. Y. 10036

611 BROAD STREET
CARLSTADT, N. J. 07072

MANUFACTURERS OF
MEDICINAL CHEMICALS

February 4, 1983

NJ0001213727

Mr. J. Hajduk
EPA Region II
26 Federal Plaza
New York, New York 10278

PAID
FEB 10 8 14 AM '83
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

*file
the sent*
Dear Mr. Hajduk:

I am looking forward to receiving the letter you promised during our telephone conversation of February 3, 1983, confirming the removal of our facilities in Carlstadt and Pennsville from your records as TSDF's. As you know, both facilities are generators only.

If you have not already done so, Mr. Hajduk, I would appreciate it if you would insure that the NJ DEP, div. of Waste Management, Bureau of Engineering Review and the Bureau of Compliance and Enforcement are made aware of our status as a generator only. Apparently there has been some confusion over submitting reports. Since we were listed as TSDF's in EPA's computer printout the N.J. DEP wanted a report on our activities as TSDF's. They were informed by copy of our letter to Dr. Richard Baker that we are only generators, not TSDF's. This I was told recently by Mr. Nedick of the N.J. DEP Engineering Review Bureau, is not adequate to resolve the issue. Notification from EPA on our status as generators only is required. It is my understanding that a copy of your aforementioned letter sent to Mr. Frank Coolick of N.J. DEP, Div. of Waste Management, Bureau of Engineering and a copy to Mr. David Shotwell of the Bureau of Compliance & Enforcement would suffice.

Page 2

February 4, 1983

Mr. J. Hajduk, EPA Region II

Thank you for your time, cooperation and assistance in my efforts to bring this matter to a satisfactory conclusion.

Kind Regards,

GANES CHEMICALS, INC.



W.J. Melofchik

WJM/mn

cc: Dr. R. Miller ✓
Dr. R. Baker ✓
Dr. C. Engeler
Mr. F. Coolick
Mr. D. Shotwell
Mr. W. Nedick.

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: ZURICH INSURANCE COMPANY
Address of Insurer: 156 WILLIAM STREET
NEW YORK, NEW YORK 10038

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: GANES CHEMICAL, INC.
Address of Insured: 1114 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10036

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for "sudden accidental occurrences." The limits of liability are \$1,000,000 each occurrence and \$1,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number GA 80 67 852 issued on 6/1/82. The effective date of said policy is 6/1/82.

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

SCHEDULE

<u>Name of Facility</u>	<u>Address or Location</u>	<u>EPA Identification Number</u>
GANES CHEMICAL, INC.	611 BROAD STREET CARLSTADT, N.J.	NJD001213727
GANES CHEMICAL, INC.	INDUSTRIAL PARK ROAD PENNSVILLE, N.J.	NJD064344575

Richard P. Whelan Underwriter
Authorized Representative & Title

(Type Name) Richard P. Whelan

Name of Insurer Zurich Insurance Company

Address of Insurer 156 William Street

New York, N.Y. 10038

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: ZURICH INSURANCE COMPANY
Address of Insurer: 156 WILLIAM STREET
NEW YORK, NEW YORK 10038

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: GANES CHEMICAL, INC.
Address of Insured: 1114 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK, 10036

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for "sudden accidental occurrences." The limits of liability are \$4,000,000 each occurrence and \$4,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number 81-41-470 issued on 6/1/82. The effective date of said policy is 6/1/82. This insurance is excess of underlying limits of \$1,000,000 each occurrence and \$1,000,000 Annual aggregate.

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

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SCHEDULE

<u>Name of Facility</u>	<u>Address or Location</u>	<u>EPA Identification Number</u>
GANES CHEMICAL, INC.	611 BROAD STREET CARLSTADT, NJ	NJD001213727
GANES CHEMICAL, INC.	INDUSTRIAL PARK RD. PENNSVILLE, NJ	NJD064344575

Richard P. Whelan, Underwriter
Authorized Representative & Title

(Type Name) Richard P. Whelan

Name of Insurer Zurich Insurance Company

Address of Insurer 156 William Street

New York, N.Y. 10038

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 25, 2016 - 4:06 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD001213727	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 07/25/2016		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages: 7 Total Handlers: 1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 25, 2016 - 4:06 PM

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NOVUS FINE CHEMICALS INC

County Name / Code: BERGEN / NJ003

NJD001213727

Location: 611 BROAD ST; CARLSTADT, NJ 07072

REGION 02

Mailing: 426 ORCH ST; CARLSTADT, NJ 07072-1417

Activity Location: NJ	State District: NORTHERN	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: N
Generator: N	Transporter: N	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW): N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 12/20/2005	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 01/21/2006		Actual Compliance Date: 12/22/2005	RTC Qualifier: OBSERVED	Sequence Number: 6
CEI Evaluation	12/20/2005	Activity Location: NJ	By: State	Identifier: 001	Person: NOJAD
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 12/20/2005	Identifier: 001	
Docket:		Agency: State	Responsible Person: NOJAD	Branch: N	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 08/21/2001	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 09/04/2001		Actual Compliance Date: 08/21/2001	RTC Qualifier: OBSERVED	Sequence Number: 5
CEI Evaluation	08/21/2001	Activity Location: NJ	By: State	Identifier: 001	Person: NOSDS
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 11/09/2001	Identifier: 001	
Docket:		Agency: State	Responsible Person: NOSDE	Branch: N	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 09/28/2001	Identifier: 001	
Docket:		Agency: State	Responsible Person: NOSDS	Branch: N	
Penalty Information:	Proposed: \$2,000	Final Monetary:	Collected:	Total Final:	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 09/04/2001	Identifier: 001	
Docket:		Agency: State	Responsible Person: NOSDS	Branch: N	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 06/14/1994	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 07/14/1994		Actual Compliance Date: 07/01/1994	RTC Qualifier: OBSERVED	Sequence Number: 4
NRR Evaluation	07/01/1994	Activity Location: NJ	By: State	Identifier: 000	Person: NJMS
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:
CEI Evaluation	06/14/1994	Activity Location: NJ	By: State	Identifier: 000	Person: NJMS
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 25, 2016 - 4:06 PM

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NOVUS FINE CHEMICALS INC, NJD001213727, CARLSTADT, NJ, continued -

Enforcement:	Activity Location: NJ	Type: 120	Action Date: 06/14/1994	Identifier: 000
Docket:		Agency: State	Responsible Person: NJMS	Branch: M
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Violation:	Activity Location: NJ	Type: 268.A	Determined Date: 08/07/1987	Determined by Agency: State
	Scheduled Compliance Date: 06/05/1989		Actual Compliance Date: 12/04/1989	RTC Qualifier: OBSERVED
				Responsible Agency: State
CEI Evaluation	08/07/1987	Activity Location: NJ	By: State	Identifier: 005
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Person: R2DEP
			Day Zero:	Branch:
				Found Violation: YES
				Focus Area:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 06/05/1989	Identifier: 003
Docket:		Agency: EPA	Responsible Person: R2JCS	Branch:
Penalty Information:	Proposed: \$8,990	Final Monetary: \$8,990	Collected:	Total Final: \$8,990
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 09/27/1988	Identifier: 004
Docket:		Agency: EPA	Responsible Person: R2TM	Branch:
Penalty Information:	Proposed: \$8,990	Final Monetary: \$8,990	Collected:	Total Final: \$8,990
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 01/27/1987	Determined by Agency: State
	Scheduled Compliance Date: 01/28/1987		Actual Compliance Date: 01/28/1987	RTC Qualifier: OBSERVED
				Responsible Agency: State
NRR Evaluation	01/27/1987	Activity Location: NJ	By: State	Identifier: 004
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Person: R2DEP
			Day Zero:	Branch:
				Found Violation: YES
				Focus Area:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 01/27/1987	Identifier: 002
Docket:		Agency: State	Responsible Person: R2DEP	Branch:
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 12/06/1985	Determined by Agency: State
	Scheduled Compliance Date: 12/11/1985		Actual Compliance Date: 12/11/1985	RTC Qualifier: OBSERVED
				Responsible Agency: State
FCI Evaluation	12/06/1985	Activity Location: NJ	By: State	Identifier: 003
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Person: R2DEP
			Day Zero:	Branch:
				Found Violation: YES
				Focus Area: V3
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 12/06/1985	Identifier: 001
Docket:		Agency: State	Responsible Person: R2DEP	Branch:
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:

Evaluations With No Violations:

CEI Evaluation	12/15/2011	Activity Location: NJ	By: State	Identifier: 001	Person: COMLE	Branch:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 12/15/2011			Focus Area:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 25, 2016 - 4:06 PM

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NOVUS FINE CHEMICALS INC, NJD001213727, CARLSTADT, NJ, continued -

CEI Evaluation	01/12/2009	Activity Location: NJ	By: State	Identifier: 001	Person: NOMM	Branch: N	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 01/12/2009		Focus Area:
NRR Evaluation	12/22/2005	Activity Location: NJ	By: State	Identifier: 001	Person: NOJAD	Branch: N	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
FCI Evaluation	05/22/2002	Activity Location: NJ	By: State	Identifier: 001	Person: NOSDS	Branch: N	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area: V3
CEI Evaluation	08/23/2000	Activity Location: NJ	By: State	Identifier: 001	Person: NORJA	Branch: N	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CDI Evaluation	09/29/1999	Activity Location: NJ	By: State	Identifier: 000	Person: NJMM	Branch: N	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	12/16/1996	Activity Location: NJ	By: State	Identifier: 000	Person: NJRA	Branch: M	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
FCI Evaluation	08/10/1994	Activity Location: NJ	By: State	Identifier: 000	Person: NJMS	Branch: M	Found Violation: U
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: YES	Not Subtitle C: NO	Day Zero:		Focus Area: V3
CEI Evaluation	10/15/1991	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CSE Evaluation	12/04/1989	Activity Location: NJ	By: EPA	Identifier: 006	Person: R2JCS	Branch:	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation	01/13/1984	Activity Location: NJ	By: State	Identifier: 002	Person:	Branch:	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	12/01/1983	Activity Location: NJ	By: State	Identifier: 001	Person:	Branch:	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 25, 2016 - 4:06 PM

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 25, 2016 - 4:06 PM

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Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL
268.A	LDR - GENERAL

Evaluation Type	Type Description
CDI	CASE DEVELOPMENT INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION
FCI	FOCUSED COMPLIANCE INSPECTION
NRR	NON-FINANCIAL RECORD REVIEW

Focus Area	Description
V3	CONVERTED FROM V2 RCRAINFO

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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Description of codes used on the report:

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL
210	INITIAL 3008(A) COMPLIANCE
310	FINAL 3008(A) COMPLIANCE ORDER

* Note: Penalty amount may not reflect all violations cited.

